

TSD File Inventory Index

Date: May 7, 2002

Initial: CMH/ericko

Facility Name: <u>Symet Corporation (Two Folded Site)</u>		
Facility Identification Number: <u>MID062-227897</u>		
A.1 General Correspondence		B.2 Permit Docket (B.1.2)
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.1 Correspondence		.2 All Other Permitting Documents (Not Part of the ARA)
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports)
.3 Part A Application and Amendments		C.2 Compliance/Enforcement
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A.5 Ambient Air Monitoring		.1 RFI Correspondence
.1 Correspondence		.2 RFI Workplan
.2 Reports		.3 RFI Program Reports and Oversight
B.1 Administrative Record		.4 RFI Draft /Final Report

Total - 2

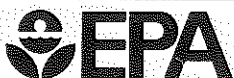
.5 RFI QAPP		7 Lab data, Soil Sampling/Groundwater	
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.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
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.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
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.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
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D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
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.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments:

*Documents do not justify individual files per schedule 0.3
Enforcement Confidential documents are in separate folder.*

**A.2 Part A/
Interim Status**



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• MID062227897

REACKNOWLEDGEMENT

DYMET CORPORATION
1901 PECK ST
MUSKEGON

MI 49441

INSTALLATION ADDRESS

1901 PECK ST
MUSKEGON

MI 49441

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

DYMET CORPORATION
1901 PECK ST.
MUSKEGON, MI. 49441
PLEASE PLACE LABEL IN THIS SPACE

001336 JAN 27 81

SAME

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)

S

F

M1D06222789721

T/A

C

A

810122

I. NAME OF INSTALLATION

Dymet Corporation

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

31901 Peck Street

CITY OR TOWN

4Muskegon

ST.

ZIP CODE

MI49441

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

51901 Peck Street

CITY OR TOWN

6Muskegon

ST.

ZIP CODE

MI49441

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

2AUSTIN JESSE BUILDING MAINT

616-726-5061

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8DYMET CORPORATION

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☐ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

M1D062227897

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F001 23 - 26	2 F006 23 - 26	3 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 23 - 26	32 23 - 26	33 23 - 26	34 23 - 26	35 23 - 26	36 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE



NAME & OFFICIAL TITLE (type or print)

JOHN E. HILTON
PRESIDENT

DATE SIGNED

1-22-81

DYMET
CORPORATION

1901 PECK STREET
P.O. BOX 1016
MUSKEGON, MICHIGAN
49443
616-726-5061



DYMET

SMALL QUANTITY GENERATOR

July 27, 1983

8/2/83 MB

RECEIVED

United States Environmental Protection Agency
Resource Conservation And Recovery Act Activities
P.O. Box A3587
Chicago, Illinois 60690

AUG 01 1983

WASTE MANAGEMENT BRANCH
EPA, REGION V

MID 062 227 897, 16

Dear Sirs,
Dymet Corporation [EPA ID NO. MID 062 227 897] would like
to change our status from Generator to Small Quantity Generator
- 40 CFR, section 261.5. We generate less than the 1000
kilograms in a calendar month. Any questions please contact
me.

Sincerely,

Jesse K. Austin
Jesse K. Austin
Building Manager

P.S. Please send me a current copy of the
Resource Conservation and Recovery Act Regulation
book.

RECEIVED
8/01/83

**C.2 Compliance/
Enforcement**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:)	DOCKET NO.
)	
DYMET CORPORATION)	COMPLAINT, FINDINGS OF
1901 PECK STREET)	VIOLATION AND COMPLIANCE ORDER
MUSKEGON, MICHIGAN 49441)	
)	
EPA I.D. NO.: MID 062 227 897)	

COMPLAINT

This Complaint is filed pursuant to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA) as amended, 42 U.S.C. §6928(a), and the United States Environmental Protection Agency's Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22. The Complainant is the Director, Waste Management Division, Region V, United States Environmental Protection Agency (U.S. EPA). The Respondent is Dymet Corporation, located at 1901 Peck Street, Muskegon, Michigan 49441.

This Complaint is based on information obtained by the U.S. EPA, including a compliance inspection conducted by the Michigan Department of Natural Resources (MDNR) on December 15, 1986. At the time of the inspection, violations of applicable State and Federal regulations were identified.

Pursuant to 42 U.S.C. §6928(a)(1), and based on the information cited above, it has been determined that Dymet Corporation has violated Subtitle C of RCRA, Sections 3002 and 3005; the Michigan Hazardous Waste Management Act, 1979 PA 64, MCL 299.501 et seq., MSA 13.30(1) et seq.; and Michigan hazardous waste management regulations, specifically Michigan Administrative Code 1985 AACs, R299.9306, R299.9307, and R299.9308.

JURISDICTION

Jurisdiction for this action is conferred upon U.S. EPA by Sections 2002(a)(1), 3006(b), and 3008(a) of RCRA, 42 U.S.C. §6912(a)(1), §6926(b), and §6928(a), respectively.

On October 30, 1986, the State of Michigan was granted final authorization by the Administrator of U.S. EPA, pursuant to Sections 3006(b) of RCRA, 42 U.S.C. §6926(b), to administer a hazardous waste program in lieu of the Federal program. See 51 Federal Register 36804 (1986). As a result, generators, transporters, and treatment, storage or disposal facilities are regulated under the Michigan provisions found at Michigan Administrative Code 1985 AACs, Parts 1 through 8, and 10, rather than the Federal regulations set forth at 40 CFR Part 260 et seq. Section 3008 of RCRA, 42 U.S.C. §6928, provides that U.S. EPA may enforce State regulations in those States authorized to administer a hazardous waste program. Notice to MDNR pursuant to this section has been provided by U.S. EPA.

FINDINGS OF VIOLATION

This determination of violation is based on the following:

1. Respondent, Dymet Corporation, is a person defined by Section 1004(15) of RCRA, 42 U.S.C. §6903(15), and Michigan Hazardous Waste Management Act, 1979 PA 64, MCL 299.505(2), MSA 13.30(5)(2), who owns and operates a facility at 1901 Peck Street, Muskegon, Michigan that generates hazardous waste.
2. Section 3010(a) of RCRA, 42 U.S.C. §6930(a), requires any person who generates or transports hazardous waste, or owns or operates a facility for the treatment, storage, or disposal of hazardous waste, to notify U.S. EPA of such activity within 90 days of the promulgation of regulations under Section 3001 of RCRA. Section 3010 of RCRA also provides that no hazardous

✓ waste subject to regulations[✓] may be transported, treated, stored or disposed of unless the required notification has been given.

3. U.S. EPA first published regulations concerning the generation, transportation, treatment, storage or disposal of hazardous waste on May 19, 1980. These regulations are codified at 40 CFR Parts 260 through 265. Notification to U.S. EPA of hazardous waste activity was required in most instances no later than August 18, 1980.

4. The Respondent, Dymet Corporation, owns and operates a facility located at 1901 Peck Street, Muskegon, Michigan. The Respondent is a Michigan corporation whose registered agent is Larry Lathrop, 1901 Peck Street, Muskegon, Michigan.

5. On January 22, 1981, Respondent filed a notification of hazardous waste activity for this facility with U.S. EPA pursuant to Section 3010 of RCRA.

✓ 6. The Respondent, Dymet Corporation, manufactures miscellaneous fabricated metal products from powdered metals. ^{The Respondent generates spent halogenated solvents and electroplating wastewater treatment sludges.} ^{se} ~~The wastes generated at the facility have~~ been identified and listed as hazardous wastes under Section 3001 of the Act (U.S. EPA Hazardous Waste Nos. F001 and F006).

7. On December 15, 1986, the MDNR conducted a RCRA inspection of Respondent's facility and observed the following violations of Michigan Administrative Code (MAC):

✓ ^b a. Failure to mark the date upon which each period of accumulation begins and the words "Hazardous Waste" on the ^{containers} ~~drums~~ of waste, in violation of MAC R299.9306(1)(b) and (c) (40 CFR 262.34(a)(2) and (3)). ✓

✓ ^c b. Failure to keep a copy of each manifest signed in accordance with ^{MAC} R299.9304(4) for three years from the date the waste was accepted by the initial transporter, in violation of MAC R299.9307 (40 CFR 262.40(a)). ✓

- g. Failure to prepare and submit biennial report to the Regional Administrator, in violation of MAC R299.9308(1) (40 CFR 262.41(a)).
- e. Storage of hazardous waste for greater than 90 days without having ^{or an operating license} interim status, and without adhering to the requirements for a storage facility, in violation of MAC R299.9306(3) (40 CFR 262.34(a)).
- c. Failure to establish and distribute a contingency plan and emergency procedures, in violation of MAC R299.9306(1)(d) (40 CFR 265 Subpart D).
- d. Failure to keep ^a records of ~~job titles and job descriptions~~, and failure to provide and keep records of personnel training, in violation of MAC R299.9306(1)(d) (40 CFR 265.16).
- a. Failure to inspect areas where containers were stored, at least weekly, looking for leaks in violation of MAC R299.9306(1)(a) (40 CFR 265.174).
8. On December 22, 1986, MDNR sent a Letter of Warning (LOW) to Respondent requesting correction of the violations cited in Finding 7 by January 30, 1987.
9. On January 6, 1987, Respondent requested, by letter, a 90 day extension to come into compliance with the violations identified in the LOW.
10. On March 23, 1987, MDNR telephoned Respondent and was informed that the violations cited in Finding 7, Paragraphs ^b(a) and ^c(b) had been corrected, and that Respondent was in the process of correcting the violations cited in Finding 7, Paragraphs ^c(d) and (e).
11. On March 26, 1987, Respondent sent to MDNR a copy of the biennial report, correcting the violation stated in Finding 7, Paragraph ^d(e).
12. On June 9, 1987, Respondent sent MDNR a contingency plan and emergency procedures.

- A. Respondent shall, immediately upon this Order becoming final, achieve and maintain compliance with the standards applicable to generators of hazardous waste except as provided for in Paragraphs B, C, and D below.
- B. Respondent shall, within 30 days of this Order becoming final, submit to U.S. EPA and MDNR manifests documenting that the hazardous waste stored on site for greater than 90 days has been removed.
- C. Respondent shall, within 30 days of this Order becoming final, submit to U.S. EPA and MDNR a contingency plan which complies with the requirements of Michigan Administrative Rules R299.9306(4).
- D. Respondent shall, within 30 days of this Order becoming final, submit to U.S. EPA ^{and} MDNR ~~and~~ ^{documenting that} records ~~of administering~~ a hazardous waste training ^{has been administered implemented} program which complies with the Michigan Administrative Rules R299.9306(4). (1)(d)

Respondent shall notify U.S. EPA in writing upon achieving compliance with this Order or any part thereof. This notification shall be submitted no later than the time stipulated above to the Waste Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, Attention: Marian Barnes, RCRA Enforcement Section (5HE-12).

A copy of these documents and all correspondence with U.S. EPA regarding this Order shall also be submitted to Dennis Drake, Chief, Compliance and Enforcement Section, Waste Management Division, Michigan Department of Natural Resources, P.O. Box 30028, Lansing, Michigan 48909.

Notwithstanding any other provision of this Order, an enforcement action may be brought pursuant to Section 7003 of RCRA or other statutory authority where the handling, storage, treatment, transportation, or disposal of solid or hazardous waste at this facility may present an imminent and substantial endangerment to human health or the environment.

PROPOSED CIVIL PENALTY

In view of the above determination and in consideration of the seriousness of the violations cited herein, the potential harm to human health and the environment, the continuing nature of the violations, and the ability of the Respondent to pay penalties, the Complainant proposes to assess a civil penalty in the amount of THREE THOUSAND SEVEN HUNDRED AND FIFTY DOLLARS (\$3,750) against the Respondent, Dymet Corporation, pursuant to Sections 3008(c) and 3008(g) of RCRA, 42 U.S.C. §6928. Attachment 1 to the Complaint provides a detailed summary of the proposed civil penalty. Payment shall be made by certified or cashier's check payable to the Treasurer of the United States and shall be mailed to U.S. EPA, Region V, P.O. Box 70753, Chicago, Illinois 60673. Copies of the transmittal of the payment should be sent to both the Regional Hearing Clerk (5MF-14), Planning and Management Division and the Solid Waste and Emergency Response Branch Secretary (5CS-TUB-3), Office of Regional Counsel, U.S. EPA, 230 South Dearborn Street, Chicago, Illinois 60604.

Failure to comply with any requirements of the Order shall subject the above-named Respondent to liability for a civil penalty of up to TWENTY-FIVE THOUSAND DOLLARS (\$25,000) for each day of continued noncompliance with the deadlines contained in this Order. U.S. EPA is authorized to assess such penalties pursuant to RCRA Section 3008(c).

NOTICE OF OPPORTUNITY FOR HEARING

The above-named Respondent has the right to request a hearing to contest any material factual allegation set forth in the Complaint and Compliance Order or the appropriateness of any proposed compliance schedule or penalty. Unless said Respondent has filed an answer not later than thirty (30) days from the date this Complaint is served, Respondent may be found in default of the above Complaint and Compliance Order.

To avoid a finding of default by the Regional Administrator, you must file a written answer to this Complaint with the Regional Hearing Clerk (5MF-14), Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, within thirty (30) days of receipt of this notice. A copy of your answer and any subsequent documents filed in this action should be sent to Maria Gonzalez, Assistant Regional Counsel (5CS-TUR-3), Office of Regional Counsel, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604. Failure to answer within thirty days of receipt of this Complaint may result in a finding by the Regional Administrator that the entire amount of penalty sought in the Complaint is due and payable and subject to the interest and penalty provisions contained in the Federal Claims Collection Act of 1966, 31 U.S.C. §3701 et seq.

Your answer should clearly and directly admit, deny, or explain each of the factual allegations of which Respondent has knowledge. Said answer should contain (1) a definite statement of the facts which constitute the grounds of defense, and (2) a concise statement of the facts which Respondent intends to place at issue in the hearing. The denial of any material fact, or the raising of any affirmative defense, shall be construed as a request for a hearing.

this is not a charge

The Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation or Suspension of Permits, 40 CFR Part 22, are applicable to this administrative action. A copy of these Rules is enclosed with this Complaint.

SETTLEMENT CONFERENCE

Whether or not Respondent requests a hearing, Respondent may confer informally with U.S. EPA concerning: (1) whether the alleged violations in fact occurred as set forth above; (2) the appropriateness of the compliance schedule; and (3) the appropriateness of any proposed penalty in relation to the size of Respondent's business, the gravity of the violations, and the effect of the proposed penalty on Respondent's ability to continue in business. Respondent may request an informal settlement conference at any time by contacting this office. Any such request, however, will not affect either the thirty-day time limit for responding to this Complaint or the thirty-day time limit for requesting a formal hearing on the violations alleged herein.

U.S. EPA encourages all parties to pursue the possibilities of settlement through informal conferences. A request for an informal conference should be made in writing to Marian Barnes, RCRA Enforcement Section (5HE-12), U.S. Environmental Protection Agency, 230 South Dearborn Street, Chicago, Illinois 60604, or by calling her at (312) 886-7568.

Dated this _____ day of _____, 1987.

Basil G. Constantelos, Director
Waste Management Division
Complainant
U.S. Environmental Protection Agency
Region V

CERTIFICATE OF SERVICE

I hereby certify that I have caused a copy of the foregoing Complaint to be served upon the persons designated below, on the date below, by causing said copies to be deposited in the U.S. Mail, First Class and certified-return receipt requested, postage prepaid, at Chicago, Illinois, in an envelope addressed to:

Mr. Larry Lathrop
Registered Agent for
Dymet Corporation
1901 Peck Street
Muskegon, Michigan 49441
ep ^

and

Mr. Carl Hilton
President, Dymet Corporation
1901 Peck Street
Muskegon, Michigan 49441
ep ^ ✓

These are said persons' last addresses known to the subscriber.

I have further caused the original of the Complaint and this Certificate of Service to be served in the Office of the Regional Hearing Clerk located in the Planning and Management Division, U.S. EPA, Region V, 230 South Dearborn Street, Chicago, Illinois 60604, on the date below.

Dated this _____ day of _____, 1987.

Secretary, Hazardous Waste Enforcement Branch
U.S. EPA, Region V

RCRA ENFORCEMENT ACTION SIGN-OFF

PART I. BACKGROUND

FACILITY NAME Dymet Corporation
 FACILITY LOCATION Muskegon, Michigan
 RCRA ID NUMBER MID 062 227 897
 NATURE OF VIOLATION generator requirements - particularly
storage for greater than 90 days

ANY OTHER OUTSTANDING OR PAST ENFORCEMENT ACTIONS AGAINST THIS FACILITY:

WATER _____

AIR _____

OTHER EPA issued a L.O.W. 8-5-87, Respondent has filed Chap. 11 bankruptcyPART II. RECOMMENDATION issue 3008(a) Complaint

PART III. CONCURRENCES ON DRAFT

	INITIALS	DATE	AGREE	DISAGREE
PREPARER	<u>MB</u>	<u>9-21-87</u>	(✓)	()
CHIEF, RCRA ENF. UNIT	<u>WEM JENK</u>	<u>9/29/87</u>	(✓)	()
CHIEF, RCRA ENF. SECTION	<u>WEM</u>	<u>10-2-87</u>	(✓)	()
ASSISTANT REGIONAL COUNSEL	<u>Gonzalez</u>	<u>11-19-87</u>	(✓)	()
NAME & DATE OF STATE CONTACT NOTIFIED	<u>ACJ</u>	<u>11/19/87</u>	(✓)	()
<u>9-25-87 3008(a) notice to A. Howard</u>				

PART IV. APPROVAL

1. PREPARER	_____	_____	()	()
2. CHIEF, RCRA ENF. UNIT	_____	_____	()	()
3. CHIEF, RCRA ENF. SECTION	_____	_____	()	()
4. CHIEF, H.W. ENF. BRANCH	_____	_____	()	()
5. ASSISTANT REGIONAL COUNSEL	_____	_____	()	()
6. CHIEF, S.W. & E.R. SECTION	_____	_____	()	()
7. CHIEF, SOLID WASTE & EMER. RESPONSE BRANCH	_____	_____	()	()
8. REGIONAL COUNSEL	_____	_____	()	()
9. DIRECTOR, WASTE MGT. DIV.	_____	_____	()	()

NOTE: Attach sign-off sheet to yellow copy of the enforcement action.

5HE-12

DEC 29 1987

Mrs. Elizabeth Bols
Michigan Dept. of Natural Resources
Waste Management Division
350 Ottawa NW, 6th Floor
Grand Rapids, Michigan 49503

Re: Dymet Corporation
Compliance Status
MID 062 227 897

Dear Mrs. Bols:

Enclosed is a copy of a telephone memo documenting my conversation with Jesse Austin regarding removal of drums of hazardous waste. Based on the documented conversation and the manifests Mr. Austin has sent to you, U.S. EPA considers Dymet Corporation to have responded to the outstanding violations cited in your July 15, 1987 referral letter. U.S. EPA will not pursue further enforcement action against Dymet Corporation at this time.

Sincerely yours,

Marian Barnes
MI/MI Unit

Enclosure

bcc: M. Gonzales, ORC

UNITED STATES DEPARTMENT OF JUSTICE FEDERAL BUREAU OF INVESTIGATION WASHINGTON, D. C. 20535	DATE 12/29/87	TO NY	FROM MEMPHIS	SUBJECT MURKIN	FILE NO. 100-441101	NEW YORK 100-441101	NEW YORK 100-441101
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5HE-12

SEP 25 1987

Alan Howard, Director
Waste Management Division
Michigan Department of
Natural Resources
P.O. Box 30028
Lansing, Michigan 48909

Re: RCRA 3008(a)(2) Notice
Dymet Corporation
EPA I.D. No.: MID 062 227 897

Dear Mr. Howard:

Pursuant to Section 3008(a)(2) of the Resource Conservation and Recovery Act (RCRA), as amended, I am providing notice to you that the United States Environmental Protection Agency is preparing to issue an Order under Section 3008(a)(1) to the subject facility for violations of generator requirements.

If you have any questions on this matter, please contact Marian Barnes of my staff at (312) 886-7568.

Sincerely yours,

William H. Miner, Chief
Hazardous Waste Enforcement Branch

cc: Dennis Drake, MDNR
R. Waybrant, MDNR

bcc: J. Traub, SWB

5HE:MBARNES:voliver:9/24/87:Disk VI

CARR 9/24

	ADMIN	OTHER STAFF	UNIT CHIEF	SECT. SECY	SECT. CHIEF	HWHEB CHIEF	HWHEB DIR
10. 9/24/87	9/24/87		9/24/87	9/24/87	9/24/87	9/24/87	

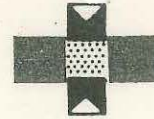
DYMET
CORPORATION

1901 PECK STREET
P.O. BOX 1016
MUSKEGON, MICHIGAN
49443
616-726-5061

RECEIVED

SEP - 8 1987

U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT (HWA)



DYMET

September 4, 1987

Ms. Bert Schmitt
Commercial Pumping Inc.
P.O. Box 248
Plainwell, MI 49080

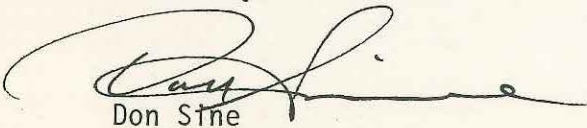
Dear Bert,

In Dymet Corporation's endeavour to comply with requirements of the MDNR and EPA they have received pricing and had attempted to establish a schedule for pick up of hazardous waste. In my effort to monitor this project the information I received was that upon several occasions when a pick up was ordered your firm could not comply because of load scheduling or incompatibility of material in the trailer. Although this may be understood it has not fulfilled the responsibility we have to remove the waste. Therefore we need your immediate attention to comply with the waste management requirements.

Please provide a written schedule for pick up of no less than two barrels per week from the Dymet facility in Muskegon. Provide firm pricing for no less than six months and with the anticipated increase for the second six month period. You may consider pricing for a smaller pick up vehicle, ie, van, if savings could be generated.

It is vitally important that we receive a firm schedule for the remaining drums of waste no later than September 11, 1987. Should you have any questions please contact me at Dymet Corporation.

Sincerely,



Don Sine

cc: Ms. Marian Barnes, United States Environmental Protection Agency
Ms. Elizabeth Bols, Michigan Department of Natural Resources



MICHIGAN DEPARTMENT OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐

Required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1969.

Failure to file is punishable under section 299.548 MCL or Section 10 of Act 136, P.A. 1969.

Form Approved. OMB No. 2050-0039 Expires 9-30-88

Please print or type.

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No. MI D 062227897		Manifest Document No. 002		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.							
3. Generator's Name and Mailing Address Dymet Corporation 1901 Peck St., Muskegon, MI 49441						A. State Manifest Document Number MI 1123848									
4. Generator's Phone 616 726-5061						B. State Generator's ID									
5. Transporter 1 Company Name A-1 Disposal Corporation						C. State Transporter's ID									
6. US EPA ID Number MI D 051969545						D. Transporter's Phone 616/685-9801									
7. Transporter 2 Company Name						E. State Transporter's ID									
8. US EPA ID Number						F. Transporter's Phone									
9. Designated Facility Name and Site Address CyanokEM, Inc. 2381 Schaefer Highway Detroit, Michigan 48227						G. State Facility's ID									
10. US EPA ID Number MI D 0918011992						H. Facility's Phone 313/933-1850									
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER) HM						12. Containers No. Type		13. Total Quantity		14. Unit M/Vol		15. Waste No. N/H			
a. Hazardous waste liquid, n.o.s. ORM-E/NA2810						206 D M		1160		G		D 0005 H			
b. Hazardous waste liquid, (plating tank sludge) (cyanide)															
c.															
d.															
16. Additional Descriptions for Materials Listed Above a. additional waste / D006, D007, D008, R007, D003 a. CyanokEM, Inc. approval # W-4397						K. Handling Codes for Wastes Listed Above a/ / b/ / c/ / d/ /									
15. Special Handling Instructions and Additional Information Dike and contain in case of leakage or spillage															
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.															
Printed/Typed Name JESS A VST						Signature <i>Jess A VST</i>						Date 11/15/98			
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name H. WRIGHT						Signature <i>H. Wright</i>		Date 11/18/98	
18. Transporter 2 Acknowledgement or Receipt of Materials						Printed/Typed Name						Signature		Date	
19. Discrepancy Indication Space															
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.															
Printed/Typed Name						Signature						Date			

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4708 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8802 24 HOURS PER DAY.



**MICHIGAN DEPARTMENT
OF NATURAL RESOURCES**

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Required under authority of Act 34, P.A. 1979, as amended and Act 136, P.A. 1969.

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Form Approved. OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M I D 0 6 2 2 2 7 8 9 7 8 1 7 0 1 1		Manifest Document No. 1		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.					
3. Generator's Name and Mailing Address Dymet Corporation 1901 Peck St., Muskegon, MI 49441						A. State Manifest Document Number MI 1032791							
4. Generator's Phone (616) 726-5061						B. State Generator's ID							
5. Transporter 1 Company Name A-1 Disposal Corporation						C. State Transporter's ID							
6. US EPA ID Number M I D 0 5 9 6 9 5 4 5 2						D. Transporter's Phone 616/685-9801							
7. Transporter 2 Company Name						E. State Transporter's ID							
8. US EPA ID Number						F. Transporter's Phone							
9. Designated Facility Name and Site Address Environmental Waste Control, Inc. 27140 Princeton Ave/PO Box 431 Inkster, MI 48141						G. State Facility's ID							
10. US EPA ID Number M I D 0 5 7 0 0 2 6 0 2						H. Facility's Phone 313/561-1400							
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER).						12. Containers		13. Total		14. Unit		15. Waste	
						No. Type		Quantity		Wt/Vol		No. N/H	
a. Hazardous waste liquid, no.s. ORM-E/NA2810													
X Hazardous waste liquid, (plating tank sludge) (cyanide)						2 D M		110 G				D 0 0 5 H	
b.													
c.													
d.													
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above							
a. additional waste // D006 D007 D008 F007 D003						a/ /							
A. E.W.C. II approval // 4401						b/ /							
						c/ /							
15. Special Handling Instructions and Additional Information						<div style="border: 2px solid black; padding: 5px; display: inline-block;"> RECEIVED </div>							
Dike and contain in case of leakage or spillage													
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If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated and have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.													
Printed/Typed Name JESS AUSTIN						Signature <i>Jess Austin</i>		Date 12/15/87					
17. Transporter 1 Acknowledgement or Receipt of Materials								Date					
Printed/Typed Name H. WRIGHT						Signature <i>H. Wright</i>		Date 12/15/87					
18. Transporter 2 Acknowledgement or Receipt of Materials								Date					
Printed/Typed Name						Signature		Date					
19. Discrepancy Indication Space													
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.								Date					
Printed/Typed Name						Signature		Date					

ALL SPILLS MUST BE REPORTED TO THE MICHIGAN POLLUTION EMERGENCY ALERTING SYSTEM, IN MICHIGAN AT 1-800-292-4706 OR OUT OF STATE AT 517-373-7660 AND THE NATIONAL RESPONSE CENTER AT 1-800-424-8902 24 HOURS PER DAY.



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required under authority of Act 64, P.A. 1979, as amended and Act 136, P.A. 1969.

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UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MI D 06 22 27 8 9 7 8 7 0 1 0		Manifest Document No. 10		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.							
Generator's Name and Mailing Address Dymet Corporation 1901 Peck St., Muskegon, MI 49441						A. State Manifest Document Number MI 1123857									
4. Generator's Phone (616) 726-5061						B. State Generator's ID									
5. Transporter 1 Company Name A-1 Disposal Corporation						C. State Transporter's ID									
6. US EPA ID Number MI D 05 9 6 9 54 52						D. Transporter's Phone 616/685-9801									
7. Transporter 2 Company Name						E. State Transporter's ID									
8. US EPA ID Number						F. Transporter's Phone									
9. Designated Facility Name and Site Address Cyanokem, Inc. 12381 Schaefer Highway Detroit, MI 48227						G. State Facility's ID									
10. US EPA ID Number MI D 09 8 0 1 1 9 9 2						H. Facility's Phone 313/933-1850									
11. US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER).						12. Containers		13. Total Quantity		14. Unit		I. Waste No.		N/H	
a. X Hazardous waste liquid, n.o.s. ORM-E/NA2810 Hazardous waste liquid, (plating tank sludge) (cyanide)						4 D M		130		G D P P P		H			
b.															
c.															
d.															
J. Additional Descriptions for Materials Listed Above Additional waste D006, D007, D008, F007, D003 A. Cyanokem, Inc. approval W-4397						K. Handling Codes for Wastes Listed Above						a/		b/	
						RECEIVED									
15. Special Handling Instructions and Additional Information DIKE and contain in case of leakage or spillage										DEC 17 1987					
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Printed/Typed Name JESS AUSTIN					Signature Jess Austin					Date 12/15/87					
17. Transporter 1 Acknowledgement of Receipt of Materials										Date					
Printed/Typed Name H. WRIGHT					Signature H. Wright					Date 12/15/87					
18. Transporter 2 Acknowledgement or Receipt of Materials										Date					
Printed/Typed Name					Signature					Date					
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Printed/Typed Name					Signature					Date					



**MICHIGAN DEPARTMENT
OF NATURAL RESOURCES**

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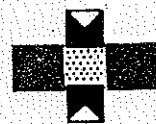
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Please print or type

Form Approved OMB No. 2050-0039 Expires 9-30-88

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No.	Manifest Document No.	2-Page	Information in the shaded areas is not required by Federal law
1. Generator's Name and Mailing Address Dynal Corporation 1901 Peck St., Muskegon, MI 49441		3. US EPA ID Number MI D 06 2 2 2 7 8 9 7 8 7 0 0 3		A. State Manifest Document Number MI 1123849	
4. Generator's Phone 616 726-3061		5. Transporter 1 Company Name A-1 Disposal Corporation		B. State Generator's ID	
6. Transporter 1 US EPA ID Number MI D 0 5 9 6 9 5 4 5 2		7. Transporter 2 Company Name		C. State Transporter's ID	
8. Transporter 2 US EPA ID Number		9. Designated Facility Name and Site Address Cyanokem, Inc. 12381 Schaefer Highway Detroit, Michigan 48227		D. Transporter's Phone 616/685-9801	
10. US EPA ID Number MI D 0 9 8 0 1 1 9 9 2		11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID NUMBER) Hazardous waste liquid, n.o.s. ORM-E/HA2810 Hazardous waste liquid, (plating tank sludge) (cyanide)		E. State Transporter's ID	
12. Containers		13. Total Quantity		F. State Facility's ID	
No. Type		Unit		Waste No. N/H	
1 006 DM 00190		G		D 0005 B	
15. Special Handling Instructions and Additional Information Like and contain in case of leakage or spillage		16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.		K. Handling Codes for Wastes Listed Above	
17. Transporter 1 Acknowledgement of Receipt of Materials		18. Transporter 2 Acknowledgement or Receipt of Materials		a/ /	
Printed/Typed Name LESS AUSTIN		Signature <i>[Signature]</i>		b/ /	
19. Discrepancy Indication Space		Signature <i>[Signature]</i>		c/ /	
0 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19		Signature <i>[Signature]</i>		d/ /	
Printed/Typed Name		Signature		Date	



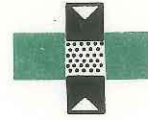
DYMET

CORPORATION

HAZARD COMMUNICATION PROGRAM

TRAINING OUTLINE

SEPTEMBER 1, 1987



DYMET

DYMET

CORPORATION

1901 PECK STREET
P.O. BOX 1016
MUSKEGON, MICHIGAN
49443
616-726-5061

September 16, 1987

Ms. Marion Barnes
United States Environmental
Protection Agency
RCRA Enforcement Section, 5HE-12
230 South Dearborn Street
Chicago, IL 60604

Dear Ms. Barnes,

In reference to your requests, and further discussions with Mr. Sine, we are pleased to forward our revised Training Outline for the Hazard Communication Program.

Please advise me if you have any further questions or comments.

Sincerely,

Jesse Austin
Safety Director

JA/jm

RECEIVED
SEP 21 1987
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

DYMET CORPORATION

HAZARD COMMUNICATION PROGRAM (HCP).

The below Communication outline for presentation to the employees of the Dymet Corporation is intended to comply with the Federal Hazard Communication Standard (HCS), 29 CFR 1910 1200 and Michigan Right to Know Law. This plan outline will be the responsibility of the Dymet Corporation's Director of Safety, and will be updated from time to time to reflect changes in Local, State or Federal regulations. Each new employee must be given a copy of this plan after having it presented by the Director of Safety, or his designee, along with a current inventory of chemicals. Additionally, this plan will be available to present to "outside" contractors prior to their performance of work in the facility.

I. PURPOSE OF A HAZARD COMMUNICATION PROGRAM (HCP).

- A. To regulate and prescribe working conditions in the work place.
- B. Provide safety procedures and safe operations by:
 - 1. Posting notices of responsibilities and rules governing safety.
 - 2. Furnishing personal protective equipment and safety devices.
 - 3. Making available information of chemicals and substances in the facility or on the grounds.
 - 4. Establishing programs of training and supervisory assistance for employees.

- C. Identification of hazards to employees and outside contractors through Safety Communication Programs.
- D. To establish programs for emergency control during working hours to protect employees.

II. INVENTORY OF ON SITE CHEMICALS AND SUBSTANCES.

A. Purchased Chemicals.

- 1. Definition and use of Material Safety Data Sheets (MSDS).
 - a. Requesting MSDS'.
 - b. Inspecting MSDS' for content and perceived accuracy.

B. Manufactured Chemicals.

- 1. Review inventory listing.
- 2. Advise location of chemicals.
- 3. Advise sources of manufactured chemicals.

C. Employee Owned Chemicals.

- 1. Define catagories and definitions of chemicals.
- 2. Explain policy of employee owned chemicals and the presence, use and storage in the work place.

III. CONTAINER LABELING. (See attached charts).

A. Identification of Substances to be labeled.

1. Portable Containers.
2. Stationary Tanks.
3. Contractors Material.

B. Appropriate labeling method.

1. Clearly labeled as to the contents.
2. Display the appropriate hazard warnings.
3. List the name and address of the manufacturer or supplier.

C. Hazard Rating Charts.

1. Flammability Noting Chart.
2. Health Rating Chart.
3. Reactivity Rating Chart.

IV. "RIGHT TO KNOW" AND ITS MEANING.

A. Required information for the employee.

1. Retention of MSDS.
2. Inventory and description of hazardous chemicals.
3. Jobs or processes with "Hazard" content.

B. Continued Education Program Requirements.

1. Introduction of new chemicals in plant.
2. Change of job to areas where hazardous substances may be present.
3. Locations of all written material concerning the Hazard Communication Program.

FLAMMABILITY HAZARD RATING CHART

0 MINIMAL HAZARD

materials which are normally stable and will not burn unless heated

1 SLIGHT HAZARD

materials that must be preheated before ignition will occur. Flammable liquids in this category will have flash points (the lowest temperature at which ignition will occur) at or above 200°F (NFPA Class II and Class IIA)

2 MODERATE HAZARD

material which must be moderately heated before ignition will occur, including flammable liquids with flash points at or above 100°F and below 200°F. (NFPA Class II and Class IIA)

3 SERIOUS HAZARD

materials capable of ignition under almost all normal temperature conditions, including flammable liquids with flash points below 73°F and boiling points above 100°F as well as liquids with flash points between 73°F and 100°F (NFPA Classes IB and IC)

4 SEVERE HAZARD

very flammable gases or very volatile flammable liquids with flash points below 73°F and boiling points below 100°F (NFPA Class IA)

HEALTH HAZARD RATING CHART

0 MINIMAL HAZARD no significant risk to health

1 SLIGHT HAZARD irritation or minor reversible injury possible

2 MODERATE HAZARD temporary or minor injury may occur

3 SERIOUS HAZARD major injury likely unless prompt action is taken and medical treatment is given

4 SEVERE HAZARD life threatening major or permanent damage may result from single or repeated exposures

REACTIVITY HAZARD RATING CHART

0 MINIMAL HAZARD

materials which are normally stable, even under fire conditions, and which will not react with water.

1 SLIGHT HAZARD

materials which are normally stable, but can become unstable at high temperatures and pressures. These materials may react with water, but will not release energy violently.

2 MODERATE HAZARD

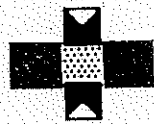
materials which in themselves are normally unstable and will readily undergo violent chemical change, but will not detonate. These materials may also react violently with water.

3 SERIOUS HAZARD

materials which are capable of detonation or explosive reaction, but require a strong initiating source, or must be heated under confinement before ignition, or materials which react explosively with water.

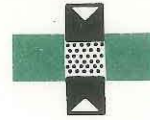
4 SEVERE HAZARD

these materials are readily capable of detonation or explosive decomposition at normal temperatures and pressures.



DYMET
CORPORATION

HAZARDOUS WASTE
CONTINGENCY PLAN
and
EMERGENCY PROCEDURES



DYMET

DYMET

CORPORATION

1901 PECK STREET
P.O. BOX 1016
MUSKEGON, MICHIGAN
49443
616-726-5061

September 30, 1987

Ms. Marion Barnes
United States Environmental
Protection Agency
RCRA Enforcement Section, 5HE-12
230 South Dearborn Street
Chicago, IL 60604

Dear Ms. Barnes,

In reference to your requests, and further discussions with Mr. Sine, we are pleased to forward our revised Hazardous Waste Contingency Plan and Emergency Procedures Outline for the Hazard Communication Program.

Please advise me if you have any further questions or comments.

Sincerely,

Jesse Austin
Safety Director

JA/jm

Enclosure

RECEIVED
OCT 05 1987
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE ENFORCEMENT BRANCH

CONTENTS

Page 1 - - - - - Company Identification and
Location.

Page 2 & 3 - - - - - Accountable Company Personnel.

Page 4 - - - - - Notification-Local Authorities.

Page 5 - - - - - Emergency Equipment On Premises.

Page 6 - - - - - Bldg. # 1 Evacuation Plan.

Page 7 - - - - - Bldg. # 2 Evacuation Plan.

Page 8 - 11 - - - - - Procedures For Emergency
Coordination.

Page 1

This contingency plan is applicable to Dymet Corporation at the below listed address, and intended to conform with regulations. The purpose of the plan is to minimize hazards to the environment of Company personnel and to establish the basis for safety process in the manufacturing facility.

Dymet Corporation is a producer of Powder Products, of various alloys, for a variety of industrial and commercial applications. The products are generally provided to original equipment manufacturers who in turn will integrate these powdered metal parts into their product.

LOCATIONS:

Dymet Corporation
1901 Peck St.
Muskegon, MI 49441

Dymet Corporation
1922 Peck St.
Muskegon, MI 49441

Page 2

Dymet Corporation operates three shifts per day with a supervisor for each shift. Their responsibilities, in addition to supervising personnel is to be aware of potential hazards within the facility and be prepared to initiate the below safety procedure for the listed emergency situations.

FIRE EMERGENCY:

1. Warn all personnel through the plant intercom system.
2. Insure the evacuation procedure is followed for all personnel.
3. Alert and direct fire and emergency units to the affected facility or location in the facility.
4. Refer to attachments A and B.

EXPLOSION EMERGENCY:

1. Insure evacuation procedure begins immediately and in an orderly fashion.
2. Alert personnel with plant intercom or alternate alarm system.
3. Alert emergency and fire control units immediately.
4. Advise all personnel to remain clear of building.
5. Refer to attachments A and B.

UNPLANNED RELEASE OF HAZARDOUS WASTE:

1. Alert personnel through plant intercom system.
2. Direct essential people to safety equipment.
3. Direct non-essential personnel to use evacuation procedure.
4. Alert, if required, emergency units.
5. Supervise the control procedure for the hazardous waste release.
6. Refer to attachments A and B.

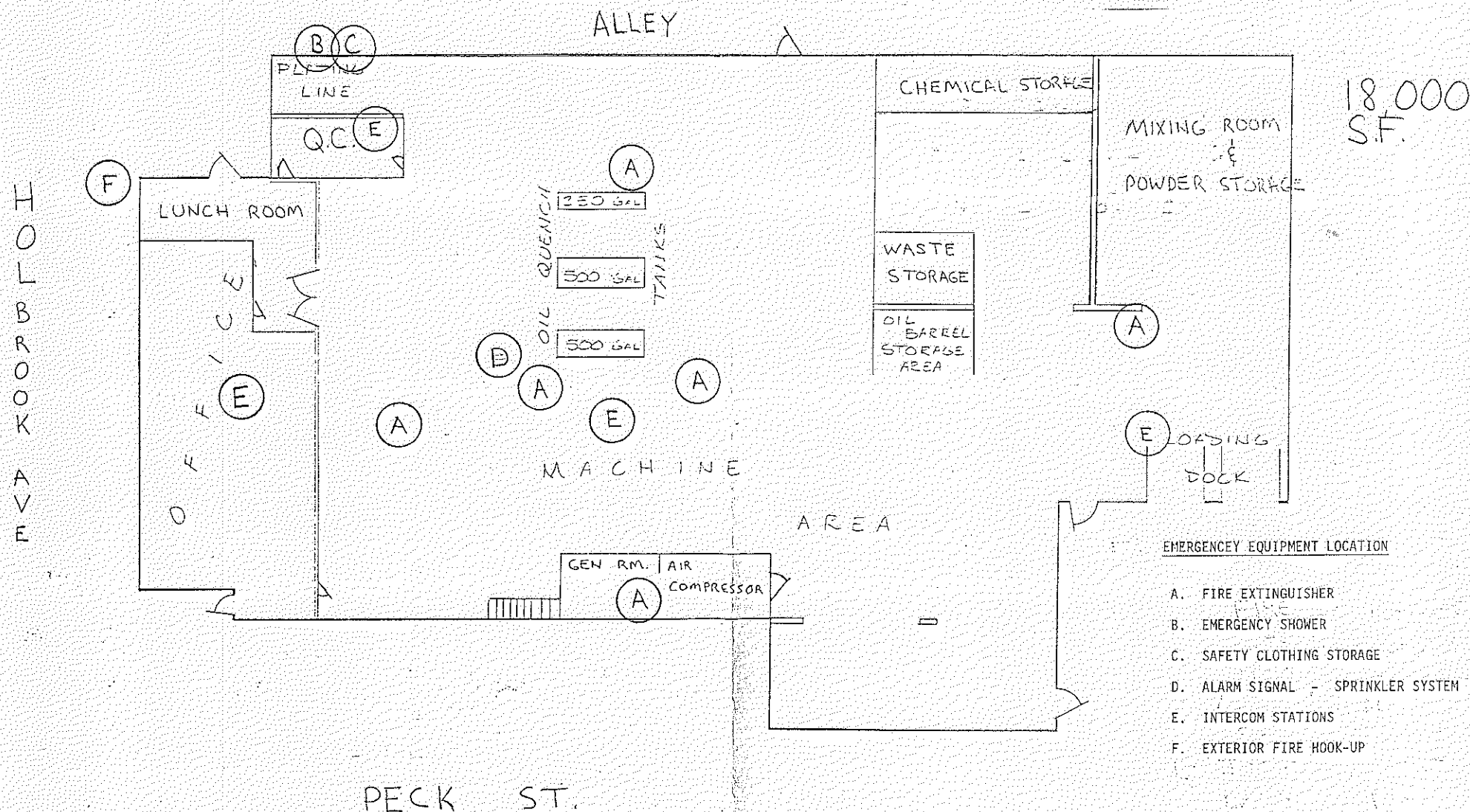
ACCOUNTABLE PERSONNEL- - - EMERGENCY COORDINATORS:

- | | |
|--------------------------------------|---|
| 1. Jesse K. Austin (Primary Contact) | 1668 Joslyn
Muskegon, MI 49445
726-5061 (Office)
Non-releasble |
| 2. Carl L. Hilton | 3974 Highgate
Muskegon, MI 49441
726-5061 (Office)
Non-releasble |
| 3. Walter L. Posvistak | 3830 S.Dangle Rd.
Muskegon, MI 49444
726-5061 (Office)
Non-releasble |
| 4. Melvin S. Eacker | 1279 Barnes Rd.
Muskegon, MI 49442
726-5061 (Office) |

-



DYMET CORPORATION
1901 PECK ST. P. O. BOX 1016
MUSKEGON, MICHIGAN 49443
(616) 726-5061

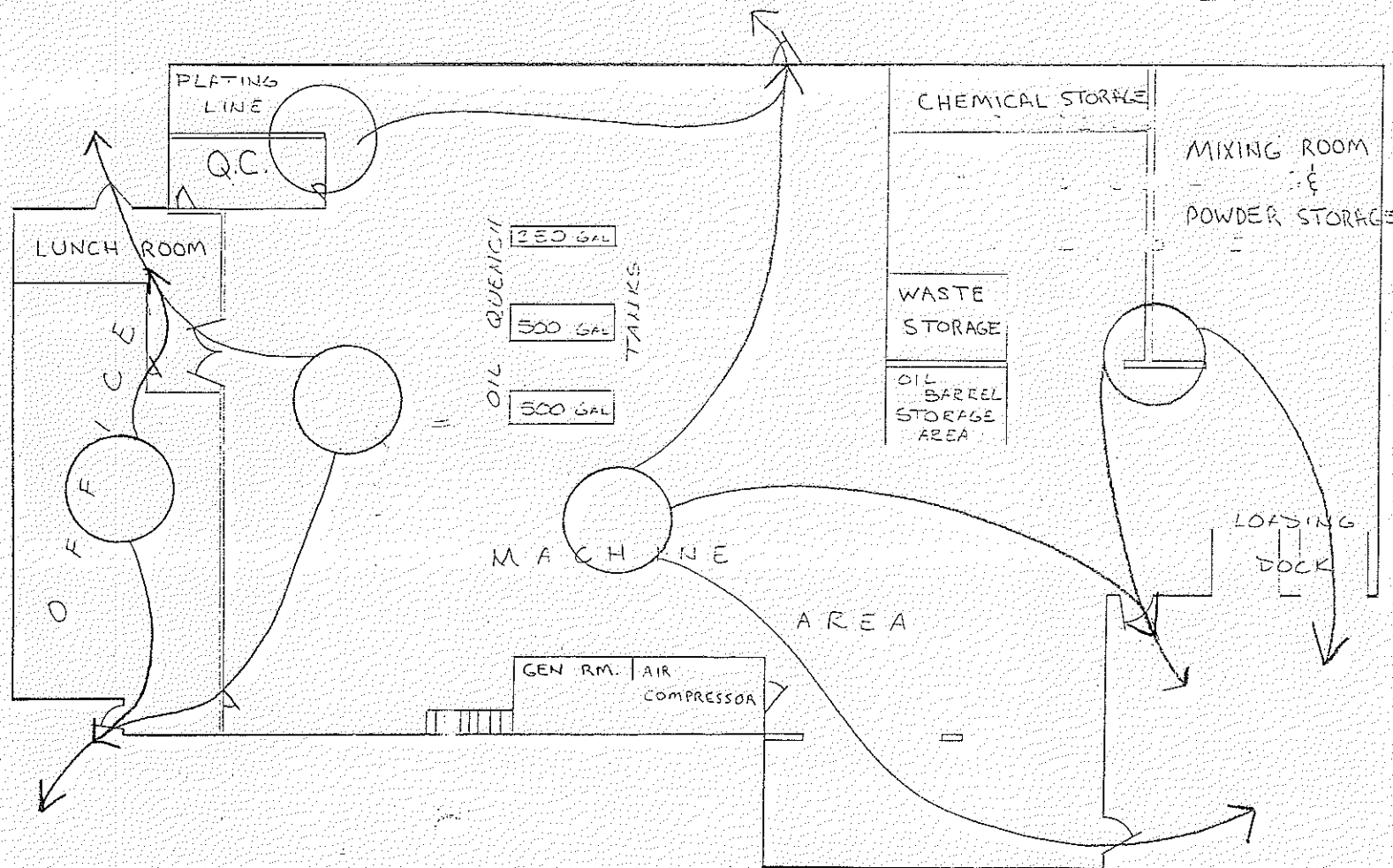


EVACUATION ROUTES (INCLUDING EXITS)

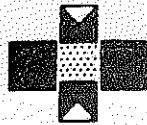


DYMET CORPORATION
1901 PECK ST. P. O. BOX 1016
MUSKEGON, MICHIGAN 49443
(616) 726-5061

HOLBROOK AVE



PECK ST.



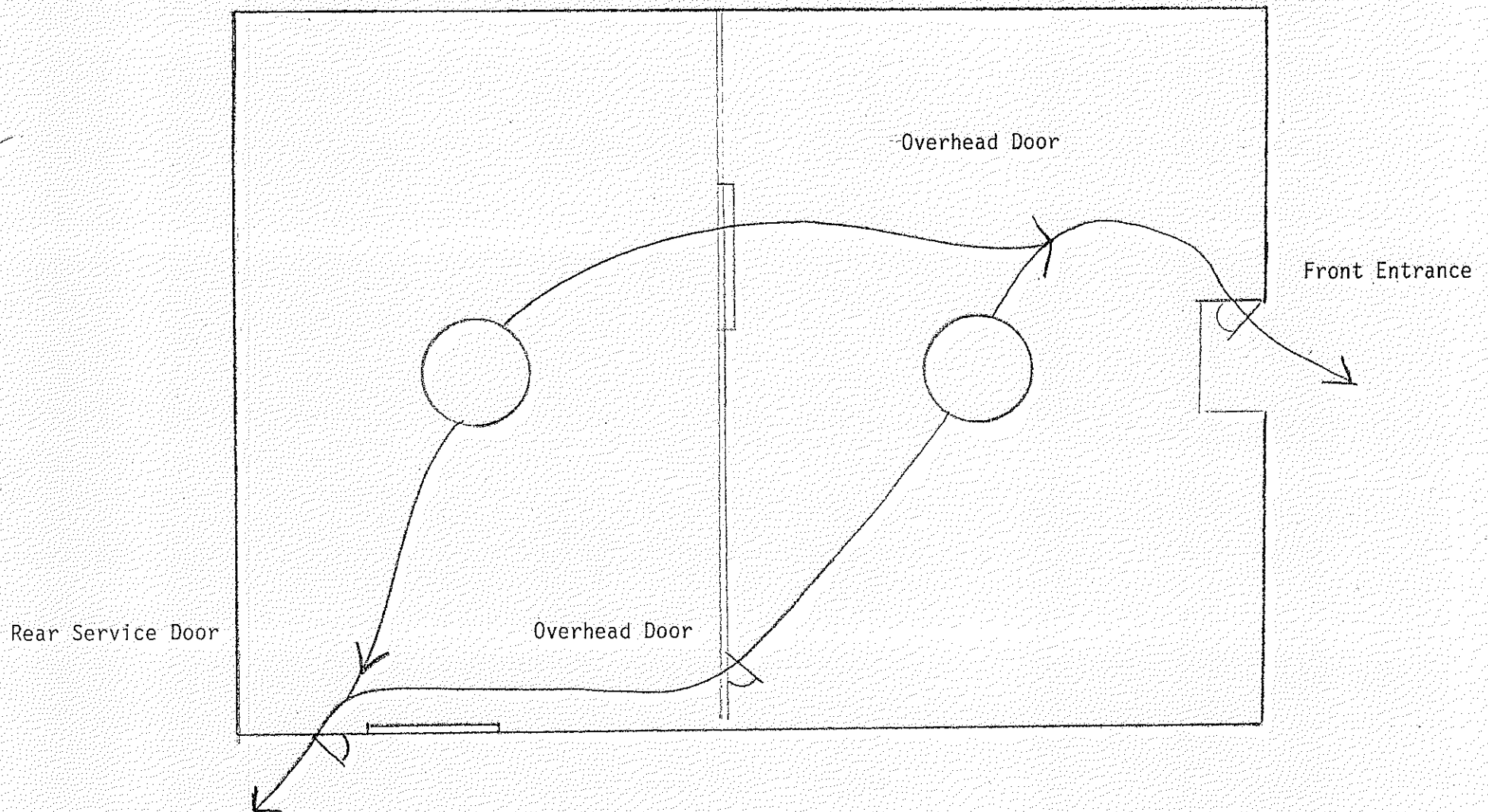
DYMET CORPORATION

1901 PECK ST., P. O. BOX 1016

MUSKEGON, MICHIGAN 49443

(616) 726-5061

BUILDING #2 EVACUATION PLAN



PROCEDURES FOR EMERGENCY COORDINATOR AND/OR HIS DESIGNEE:

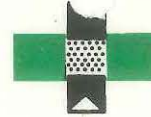
In the event of an emergency situation the person on duty will be responsible for the following actions.

1. Activate alarms and notify all personnel in or on the Company's property.
2. Notify the emergency units for assistance.
3. Insure evacuation of the premises is achieved.
4. Asses any release of hazardous materials, or damage to containment areas, or potentail destruction of contained substance vessels as it would relate to human health or the environment.
5. Report all findings to his immediate supervisor and/or the local authorities or emergency units.
6. Take all reasonable measures necessary to insure that release of hazardous materials is inhibited by stopping production or operations and to satisfy a safe condition before resuming production.
7. After the emergency take all necessary steps to clean, store and make safe any substance that could create a hazard. Additionally, inspect for possibe leaks or open containers and immediately arrange for clean up and disposal with approved methods.

DYMET

CORPORATION

1901 PECK STREET
P.O. BOX 1016
MUSKEGON, MICHIGAN
49443
616-726-5061



DYMET

August 17, 1987

United States Environmental
Protection Agency
RCRA Enforcement Section, 5HE-12
230 South Dearborn Street
Chicago, IL 60604



ATTN: Marian Barnes

Dear Mr. Barnes,

To confirm our recent conversation I have, as an advisor, been asked to look into the problem or hazardous waste removal from the Dymet Corporation premises. In my initial investigation it was found that the transporter we originally contracted with did not respond as originally expected. Additionally there was a delay internally because of the extraordinary high cost of removal and the investigation to secure a less expensive means to dispose of the material.

In the past several days we have found another transporter and a processor that may be more dependable and more economical. That Company requested certain documentation which we are preparing to receive a quotation within the next two to three weeks. At the time we receive the new quote we will begin shipping the waste material at the rate of one or more barrels per week. I will advise your office and the Michigan DNR Office the current status on a semi weekly basis. The long range plan is to eliminate the plating process if our customer will allow a substitute finish. Should we be required to continue with cadmium there maybe a process to dilute the residue through chlorination which reduces the cyanide content and allows for more economical disposal. There remains a substantial amount of study to make the best determination of a viable solution. We will accomplish the study as soon as possible.

The week of August the 17th. I will correspond with your office concerning the personnel training. Thank you for your understanding in this matter.

Sincerely,

D.E. Sine

DS/jm

0 5 AUG 1987

5HE-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Carl Hilton, President
Dymet Corporation
1901 Peck Street
Muskegon, Michigan 49441

Re: Letter of Warning
MID 062 227 897

Dear Mr. Hilton:

Representatives of the Michigan Department of Natural Resources (MDNR) have notified the United States Environmental Protection Agency (U.S. EPA) that Dymet Corporation is in violation of regulations identified in the Michigan Administrative Code (MAC) of the Michigan Hazardous Waste Management Act, P.A. 1979. This determination is based on an inspection of Dymet Corporation's facility located at 1901 Peck Street, Muskegon, Michigan by the MDNR on December 15, 1986, and on subsequent correspondence.

At the time of the inspection, a number of violations were observed. Listed below are the unresolved violations and the actions taken by Dymet Corporation in attempt to resolve these violations:

- 1) A generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the applicable requirements (MAC R299.9306(3)). Since the time of the inspection, two drums of hazardous waste which were stored for greater than 90 days have been removed, with 10 drums remaining on-site.
- 2) A generator may accumulate waste in containers provided that the generator provides a secondary containment system (MAC R299.9306(1)(a)). Dymet Corporation, upon removal of the waste stored on site for greater than 90 days may be a small quantity generator, in which case this requirement would not be applicable.
- 3) Personnel training records were not available for review (MAC R299.9306(1)(d)). Since the time of the inspection, personnel training has been conducted in conjunction with "Right-to-Know" training. However, this training does not completely meet the requirements of MAC R299.9306(1)(d).

- 4) A Contingency Plan and Emergency Procedures were not available for review (MAC R299.9306(1)(d)). A Contingency Plan and Emergency Procedures was submitted to MDNR on June 9, 1987, and was found to be inadequate. A July 13, 1987, letter from MDNR to Dymet Corporation documented the deficiencies of the Contingency Plan and Emergency Plan. A revised plan has not been submitted.

An additional matter of concern is that two EPA identification numbers had been obtained by the facility. Dymet Corporation has made an attempt to cancel one of the identification numbers.

In order to comply with the requirements of the Michigan Hazardous Waste Management Act, P.A. 1979, the U.S. EPA is requiring Dymet Corporation to submit certain information. Within 5 days of receipt of this letter, submit documentation that an agreement has been reached with a transporter to remove in the next 90 days all hazardous waste which has been stored on site for greater than 90 days. Copies of manifests that are used to remove the waste shall be submitted when each shipment of waste is made. Within 14 days of receipt of this letter, submit a record of personnel training, a revised Contingency Plan and Emergency Procedures, and a discussion of attempts which have been made to cancel one of the U.S. EPA identification numbers. Please submit this information, as well as any other correspondence to:

Marian Barnes
United States Environmental
Protection Agency
RCRA Enforcement Section, 5HE-12
230 South Dearborn Street
Chicago, Illinois 60604

A copy of this information should be sent to:

Elizabeth Bols
Michigan Department of Natural Resources
Hazardous Waste Division
350 Ottawa NW, 6th Floor
Grand Rapids, Michigan 49503

Failure to comply with this letter may result in the issuance of a compliance order with penalties. If you should have any questions regarding this matter, please contact Marian Barnes or my staff at (312) 886-7568.

Sincerely yours,
ORIGINAL SIGNED BY
WILLIAM E. MUNO

William E. Muno,
RCRA Enforcement Section

	TYPIST	AUTHOR	OTHER STAFF	UNIT CHIEF	SECT. SEC'Y	SECT. CHIEF	HWER CHIEF	WMD DIR
INT. DATE	SL 8-3-87	MB 8-3-87		RL 8-3-87	AF 8-5-87	WEM 8/5/87		

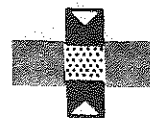
cc: Elizabeth Bols
Environmental Quality Analyst
Hazardous Waste Division, MDNR

Dennis Drake, Chief
Compliance and Enforcement Section
Hazardous Waste Division, MDNR

DYMET

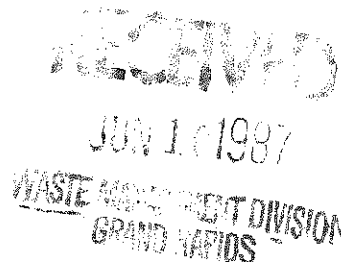
CORPORATION

1901 PECK STREET
P.O. BOX 1016
MUSKEGON, MICHIGAN
49443
616-726-5061



DYMET

June 9, 1987



State of Michigan
Dept. of Natural Resources
State Office Bldg.
350 Ottawa N.W.
Grand Rapids, MI 49503

ATTN: MS Elizabeth A. Bols

Dear Ms Bols,

Regarding your phone call on Wednesday, June 3, 1987, our current status is:

- All containers labeled and dated.
- Copies of manifest for last three years on file.
- Enclosed is copy of contingency plan.
- We have started to dispose of our plating waste.

Sincerely yours,

Jesse Austin
(Building & Safety)

JA/jm

CONTINGENCY PLAN
&
EMERGENCY PROCEDURES

RECEIVED
JUN 10 1987
WASTE MANAGEMENT DIVISION
GRAND RAPIDS

FOR FIRE, EXPLOSION OR RELEASE OF HAZARDOUS WASTE.

A. ACTIONS TO BE TAKEN (CADMIUM PLATING SOLUTION).

- a.) FIRE: Use of self containing breathing apparatus.
Use dry chemical extinguishing media.
- b.) SPILLAGE: Contain and then put waste in designated
container to be disposed of properly.

B. OILS - Barrel rack of 12-55 gal. drums.
- 3 Quench tanks each of 500 gal.

- a.) FIRE: Use water spray.
Dry chemical foam or carbon dioxide.
- b.) SPILLAGE: Contain and then put waste in designated
container to be disposed of properly.

C. Arrangements with local Fire Departments still pending.

D. PROTECTION - Sprinkler System.
In & Out Alarms.
Ten Fire Extinguishers marked throughout shop.

E. EMERGENCY - See MSDS or 1-800-424-9300 Chemtree Emergency
Coordinator for Hazardous Waste Spills.

Jesse Austin - 744-4678 - Building & Safety

Walter Posvistak - 773-2439 - Vice. Pres.

Fire Department - 911

ORP
ST
MI

BUILDING - SINTERED METALS PLANT

POWDER STORAGE,
PLATING CHEMICALS &
WASTE STORAGE

OIL
BARREL
STORAGE
AREA

LOADING
DOCK

AREA

RECEIVED

JUN 1 1987

WASTE MANAGEMENT DIVISION
GRAND RAPIDS

NORTH



* FIRE HYD.

DYMET C
1901 PECK
MUSKEGON
18 000 SF

PLATING
LINE

OIL QUENCH TANKS
250 GAL
500 GAL
500 GAL

MACHIN

AVE KOOB TO H

OFFICE

PECK ST

DYMET
CORPORATION

1901 PECK STREET
P.O. BOX 1016
MUSKEGON, MICHIGAN
49443
616-726-5061



DYMET

MAR 23 1987

COPY TO
ELIZABETH BOLS
350 OTTAWA ST NW
Grand Rapids m. 49503

March 23, 1987

US ERA Region
RCRA Activities
P.O. Box A-3587
Chicago, IL 60690

ATTN: EPA ID Number

Dear Sir:

For some reason Dymet Corporation has two ID Numbers. The first ID Number is MID-062227897, which is used mostly. The second ID Number is MID-990858003 used only once.

We have not changed Owners or Location. Please advise me on this.

Sincerely,

Jess Austin
Building & Safety

ENVIRONMENTAL PROTECTION AGENCY

GENERATOR BIENNIAL HAZARDOUS WASTE REPORT FOR 1985

This report is for the calendar year ending December 31, 1985
Read All Instructions Carefully Before Making Any Entries on Form

NON-REGULATED STATUS

Complete this section only if you did not generate regulated quantities of hazardous waste at any time during the 1985 calendar year. Circle the one code at right that best describes your status during the entire year (see instructions for explanation of codes).

- 1 Non-handler
- 2 Small Quantity Generator
- 4 Exempt
- 5 Beneficial Use
- 9 Out of Business

Please print/type with elite type (12 characters per inch)

This Installation's Non-Regulated Status is Expected to Apply:

II. GENERATOR'S EPA I.D. NUMBER

- ☐ For 1985 Only
- ☐ Permanently
- ☐ Other _____

T/A C
F M I D O 6 2 2 2 7 8 9 7 1
1 2 13 14 15

C303 ENTRY (OFFICIAL USE ONLY): ☐

III. NAME OF ESTABLISHMENT

D Y M E T C O R P O R A T I O N
30 69

IV. ESTABLISHMENT MAILING ADDRESS

3 1 9 0 1 P E C K S T R E E T P O B O X 1 0 1 6
15 16 45
Street or P.O. Box
4 M U S K E G O N M I C H I G A N M I 4 9 4 4 1
15 16 41 42 47 51
City or Town State Zip Code

V. LOCATION OF ESTABLISHMENT (if different than section IV above)

5
15 16 45
Street or Route number
6
15 16 41 42 47 51
City or Town State Zip Code

VI. ESTABLISHMENT CONTACT

2 J E S S E A U S T I N
15 16 45
Name (last and first)
6 1 6 - 7 2 6 - 5 0 6 1
46 55
Phone No. (area code & no.)

VII. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

JESSE AUSTIN

BUILDING & SAFETY MGR

Signature

Date Signed

3-25-87

ENVIRONMENTAL PROTECTION AGENCY
Generator Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

Date rec'd: _____ Rec'd by: _____

IX. FACILITY NAME (specify facility to which all wastes on this page were shipped)

III. GENERATOR'S EPA I.D. NO.

ORGANIC CHEMICALS

GIM1D06222789711
1 2 13 14 15

XI. FACILITY ADDRESS

X. FACILITY'S EPA I.D. NO.

3291 CHICAGO DR. S.W.
GRANDVILLE, MI 49418

FIM1D990858003
16 28

XII. TRANSPORTATION SERVICES USED

SPARTAN CHEMICAL COMPANY
MID079300125

XIII. WASTE IDENTIFICATION

Sequence #	Line #	A. Description of Waste	B. DOT Hazard code	C. EPA Hazardous Waste No. (see instructions)	D. Amount of Waste	E. Unit of Measure
29	1	Degreasing Fluid Containing Oil	13	01226 35 38 39 42	300	G
	2					
	3					
	4					
	5					
	6					
	7					
	8					
	9					
	10					
	11					
	12					

XIV. COMMENTS (enter information by section number—see instructions)

ENVIRONMENTAL PROTECTION AGENCY
Generator Biennial Hazardous Waste Report

This report is for the calendar year ending December 31, 1985

Date rec'd: _____ Rec'd by: _____

XV. GENERATOR'S EPA I.D. NO.

T/A C

G	M	I	D	0	6	2	2	2	7	8	9	7	1	1
1	2											13	14	15

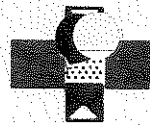
XVI. WASTE MINIMIZATION (narrative description)

We No Longer Use ORM-A UN-2831 Methylchloroform Degreasing Operation Shut Down

End

DYMET
CORPORATION

1901 PECK STREET
P.O. BOX 1016
MUSKEGON, MICHIGAN
49443
616-726-5061



DYMET

RECEIVED
HAZARDOUS WASTE DIVISION

JAN 8 1987

GRAND RAPIDS

January 6, 1987

State of Michigan
Department Of Natural Resources
State Office Building
350 Ottawa N.W.
Grand Rapids, MI 49503

ATTN: Ms. Elizabeth A. Bols

Dear Ms. Bols,

I received your letter dated December 22, 1986. I would appreciate you sending me the address for the E.P.A. to cancel out one of our E.P.A. identification numbers, and a form to do the biennial report for a generator who ships their hazardous waste off-site.

We would also like to apply for a 90 day extension period on our facilities compliance deadline.

Sincerely,

Jess Austin

Jess Austin
Building & Safety Manager

Jan 10 1987

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

Gordon E. Guyer, Director
State Office Building
350 Ottawa, N. W.
Grand Rapids, MI 49503
Phone: 616-456-5071

July 13, 1987

Jessie Austin
Dymet Corporation
P.O. Box 1016
Muskegon, MI 49443

RE: MID062227B97

Dear Mr. Austin:

This correspondence is written to acknowledge receipt of your letter and plans for Dymet Corporation located at 1901 Peck Street, Muskegon, Michigan on June 9, 1987. The plan was reviewed for completeness with regard to the requirements set forth in 40 CFR, Subpart D, Section 265.50 through 265.56, as required in Act 64, P.A. 1979, R299.9306(1)(d) and 40 CFR, Section 267.34(a)(4).

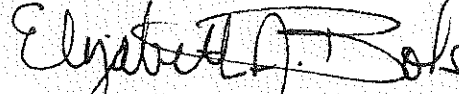
The following items were not complete:

- 1) The plan must describe arrangements agreed to by local police departments, fire departments, hospitals, contractors and state and local emergency response teams to coordinate emergency procedures.
- 2) The plan must list the office phone number and the home address of the emergency coordinator and any alternate coordinator.
- 3) The plan must list all emergency equipment (i.e., fire extinguishing systems, communication/alarm systems) the location and physical description of each item on the list along with a brief outline of its capabilities.
- 4) The plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes.
- 5) The plan must describe actions facility personnel must take in response to any fire, explosion, release, or spill.

Please keep in mind that the plan must be reviewed and immediately amended, if necessary, whenever a) applicable regulations are revised, b) the plan fails in an emergency, c) the facility changes, d) the emergency coordinator(s) change, and e) emergency equipment changes.

If you have any questions feel free to contact this office.

Sincerely,

A handwritten signature in dark ink, appearing to read "Elizabeth A. Bols". The signature is fluid and cursive, with the first name being the most prominent.

Elizabeth A. Bols
Environmental Quality Analyst
Hazardous Waste Division

EAB/lks

STATE OF MICHIGAN



NATURAL RESOURCES COMMISSION
THOMAS J. ANDERSON
MARLENE J. FLUHARTY
GORDON E. GUYER
KERRY KAMMER
STEWART MYERS
AVID D. OLSON
RAYMOND POUPORE

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

Gordon E. Guyer, Director
State Office Building
350 Ottawa, N.W.
Grand Rapids, MI 49503
Phone: 616-456-5071

July 15, 1987

RECEIVED
JUL 20 1987
U.S. EPA, REGION V
WASTE MANAGEMENT DIVISION
HAZARDOUS WASTE INTERSTATE COMPL.

Rick Karl
U.S. EPA, Region V
SHS-13
230 S. Dearborn
Chicago, IL 60604

RECEIVED

JUL 17 1987

RE: Dymet Corporation - MID062227897

SOLID WASTE BRANCH
U.S. EPA, REGION V

Dear Mr. Karl:

As per our conversation on July 13, 1987, this letter with enclosures serves as a referral for enforcement action with regard to Dymet Corporation.

During the inspection, on December 15, 1986, the following violations were observed and a deficiency letter documenting same was sent to the company on December 22, 1986:

- 1) A generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the applicable requirements: Act 64; P.A. 1979, R299.9306(3) and 40 CFR, Subpart C, Section 262.34(b).
- 2) While being accumulated on-site the date upon which the period of accumulation begins and the words "Hazardous Waste" must be labeled or clearly marked on each container (i.e. drum, tote, roll-off box): Act 64; P.A. 1979, R299.9306(1)(b) and (c) and 40 CFR, Subpart C, Section 262.34(a)(2) and (3).
- 3) A generator must keep a copy of each manifest with all signatures for three years from the date the waste was accepted by the initial transporter, Act 64; P.A. 1979, R299.9307 (2) or 40 CFR, Section 262.40 (a).
- 4) A generator may accumulate waste in containers provided that the generator provides a container storage area that is designed so that the containment system must have a sufficient capacity to contain 10% of the volume of the containers with free liquids; Act 64; P.A. 1979, R299.9306 (1) (a).

July 15, 1987
Rick Karl, U.S. EPA
RE: Dymet Corporation - MID062227897

- 5) A generator who ships his hazardous waste off-site must file a biennial report, 40 CFR, Section 262.41.
- /6) Personnel training records were not available for review: Act 64; P. A. 1979, R299.9306(1)(d) and 40 CFR, Subject C, Section 262.34(a)(4).
- /7) A Contingency Plan and Emergency Procedures was not available for review, Sections 265.50 through 265.56: Act 64; P. A. 1979, R299.9306(1)(d) and 40 CFR, Subpart C, Section 262.34(a)(4).
- 8) Generator must obtain one EPA identification number per facility located on a contiguous piece of property.

Subsequent to the initial inspection and letter were the following events:

- 1-6-87 Letter from Dymet requesting a 90-day extension for correction of the violations.
- 3-23-87 MDNR contacted Jesse Austin at Dymet and was informed of the following:
 - a) Drums had been labeled and dated;
 - b) Found missing manifests;
 - c) Waiting for approval from T/S/D for waste accumulated >90 days;
 - d) Were in the process of filling out 1985 Biennial Report;
 - e) Working on Plan.

As a result of the conversation, I sent Mr. Austin a copy of 40 CFR, Sections 265.50 - 265.56.

- 3-26-87 Received a copy of a letter sent to the U.S. EPA regarding the two U.S. EPA ID numbers at the facility and a copy of the Biennial Report.
- 5-6-87 MDNR contacted Mr. Austin, at Dymet, and was informed that:
 - a) Still working on waste removal;
 - b) Drums still labeled and dated;
 - c) Trained personnel in conjunction with "Right-to-Know" training;
 - d) Will submit copy of Contingency Plan for review.

July 15, 1987
Rick Karl, U.S. EPA
RE: Dymet Corporation - MID062227B97

6-3-87 MDNR contacted Mr. Austin at Dymet and explained that we had not received a status letter from him. At this time, Mr. Austin indicated that two drums were being shipped out but that the company could not afford to ship out the other 10 drums all at once.

6-9-87 Received a letter from Mr. Austin at Dymet stating:

- a) All containers labeled and dated;
- b) Copies of all manifests on file.

And enclosed was a copy of the Plan. The letter also stated that the company had started to remove the waste.

7-13-87 MDNR reviewed the Contingency Plan and sent a letter to Dymet indicating where the Plan was deficient.

Documentation supporting the above is enclosed. But, in addition, I offer the following, the facility was previously inspected on July 13, 1983, and was sent a deficiency letter on July 15, 1983 with the following violations:

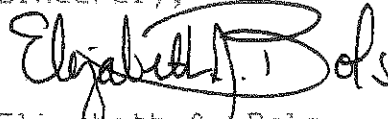
- a) Did not file Exception Report;
- b) Must label and date containers;
- c) Current Contingency Plan;
- d) Had not trained personnel.

7-27-83 After obtaining the manifests, the company declared themselves to be a small quantity generator and no longer subject to the rest of the violations.

The inspection on December 15, 1986, was initiated from information from an anonymous source.

If you have any questions, please contact me at the above number.

Sincerely,



Elizabeth A. Bols
Environmental Quality Analyst
Hazardous Waste Division

EAB/lks

Enclosure

STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

Gordon E. Guyer, Director
State Office Building
350 Ottawa, N.W.
Grand Rapids, MI 49503
Phone: 616-456-5071

December 22, 1986

Mr. Jesse Austin
Dymet Corporation
1901 Peck Street
Muskegon, MI 49441

RE: MID 062227B97

Dear Mr. Austin:

On December 15, 1986, staff of the Department of Natural Resources conducted an investigation of your facility located at 1901 Peck Street, Muskegon, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended, and with Michigan Act 64, P.A. of 1979.

As a result of the investigation, staff of the Department of Natural Resources determined that the above facility is in violation of the requirements of Subtitle C of RCRA and Act 64. Specifically, staff found that the following requirement(s) were not being met:

- 1) A generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the applicable requirements; 40 CFR. Subpart C, Section 262.34(b).
- 2) While being accumulated on-site the date upon which the period of accumulation begins and the words "Hazardous Waste" must be labeled or clearly marked on each container; Act 64; P.A. 1979, R299.9306(1)(b) and (c) and 40 CFR, Section 262.34(a)(2) and (3).
- 3) A generator must keep a copy of each manifest with all signatures for three years from the date the waste was accepted by the initial transporter, Act 64; P.A. 1979, R299.9307(2) or 40 CFR, Section 262.40(a).

Page 2
Dymet Corporation
Elizabeth A. Bols
December 22, 1986

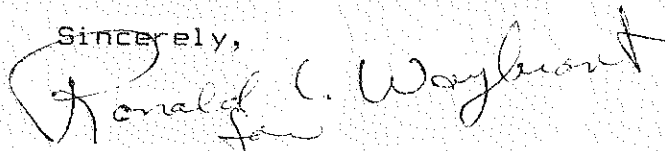
- 4) A generator may accumulate waste in containers provided that the generator provides a container storage area that is designed so that the containment system must have a sufficient capacity to contain 10% of the volume of the containers with free liquids; Act 64; P.A. 1979, R299.9306(1)(a).
- 5) A generator who ships his hazardous waste off-site must file a biennial report, 40 CFR, Section 262.41.
- 6) Personnel training records were not available for review, Section 265.16, mandated in 40 CFR, Subpart C, Section 262.34(a)(4).
- 7) A Contingency Plan and Emergency Procedures was not available for review, Sections 265.50 through 265.56; 40 CFR, Subpart C, Section 262.34(a)(4).
- 8) Generator must obtain one EPA identification number per facility located on a contiguous piece of property.

*sent copy
of biennial report
on 1-23-86*

We request that you respond to this letter by January 12, 1987, providing documentation to this office regarding those actions being taken to correct the above stated violations and correction of same violations prior to January 30, 1987. The DNR will evaluate your response and determine your facility's compliance status.

If you have any questions, feel free to contact me and address your response to the address on this letter.

Sincerely,



Elizabeth A. Bols
Environmental Quality Analyst
Hazardous Waste Division

EAB/mn

Enclosure (sqg info.)

ACT 64 INSPECTION REPORT

U.S. EPA I.D. NUMBER M 1 D 0 6 2 2 2 7 8 9 7
(or Michigan)

FACILITY NAME

Dymet Corporation

1901 Peck Street

Muskegon

CITY

MICHIGAN 49441

ZIP CODE

DATE 12-15-86

TIME OF INSPECTION (FROM) _____ (TO) _____

PERSON(S) INTERVIEWED

TITLE

TELEPHONE

Jesse Austin

INSPECTOR(S)

AGENCY/TITLE

TELEPHONE

Elizabeth A. Bols

MDNR

(616) 456-5071

Primary Business of this Facility: _____

Reason for Inspection:

X Routine

____ Follow-up

____ Complaint

INSPECTION FORMS:

Based upon the inspection, this facility:

FORM

____ is a non-generator/conditionally exempt small quantity generator

____ small quantity generator

X generator

____ transporter

____ treatment/storage/disposal facility

A
A
B
C
D

Date of Last Inspection 7-13-83

Dymet Corporation
12-15-86

INSPECTION FORM B
Part 3 Rules
P.A. 64 of 1979

GENERATOR INSPECTION FORM

(Generates 1000 kg per month or accumulates 1000 kg at any time)

X Drums (Containers)
____ Above ground tank(s)
____ Underground tank(s)
____ Other _____

HAZARDOUS WASTE CODE/NAME	WASTE STREAM(S) SOURCE	TYPE OF STORAGE	HOW MUCH
<u>DD06</u>	<u>Cd plate bottoms</u>	<u>drums</u>	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

COMMENTS:

generation is @ the rate of 2.4 55 gallon drums/year
but facility has accumulated 5-55 gallon & 11-35 gallon
drums of waste on-site

WASTE EVALUATION (RULE 302)

INSPECTION FORM B

- | | Yes | No | N/A | Violation
Class |
|---|-------------------------------------|--------------------------|--------------------------|--------------------|
| 1. Has generator determined if waste streams are hazardous in accordance with Rule 302. | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>I</u> |

Comments: _____

MANIFEST REQUIREMENTS (RULE 304)

- | | | | | |
|---|-------------------------------------|--------------------------|--------------------------|-----------|
| 2. a.) Does the generator have copies of the manifest available for review and onsite 262.40 | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>II</u> |
| b.) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. | | | <u>0</u> | |

Comments: _____

need to find copy of all manifested shipments

- | | | | | |
|---|--|--------------------------|--------------------------|-----------|
| 3. Do the manifest forms examined contain the following information (If so, make copies of, or record information from manifests that do not contain the critical elements: | <i>last manifest for haz waste was true. they used to use 85</i> | | | |
| a.) Manifest document number (Rule 304 (2) (a)? | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>II</u> |
| b.) The generator's name, mailing address, telephone number, and EPA Identification Number (Rule 304(a)(b) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>II</u> |
| <i>- only have one id# / facility</i> | | | | |
| c.) The name and EPA ID number of Transporter (Rule 304(2)(c) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>II</u> |
| d.) Name, address, and EPA ID number of designed permitted facility and alternate facility (Rule 304(2)(d) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <u>II</u> |

INSPECTION FORM B

	Yes	No	N/A	Violation Class
e.) The description of waste(s) (DOT shipping name, DOT hazard class, DOT identification number, Rule 304(2)(e))	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
f.) The total quantity of waste(s) and the type and number of containers loaded Rule 304(2)(f)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
g.) Hazardous waste number describing the wastes. Rule 304(2)(g)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	II
h.) Certification as required in Rule 304 (2)(h)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> in 1985	II
i.) Signatures as required in Rule 304(4)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
j.) Waste minimization program/certification.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> on 85 manifest	I

Comments: _____

4. Reportable exceptions, Rule 308(3), 40 CFR 262.42

a.) For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment.

I

b.) For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator.

N/A

Comments: _____

INSPECTION FORM B
Violation
Class

Yes No N/A

BIENNIAL REPORT
Rule 308

5. Has the generator submitted a biennial report by March 1 of even numbered years Rule 308(1) (copies of report must be retained at least 3 years)

II

COMMENTS:

PRE-TRANSPORT REQUIREMENTS
Rule 305, 40 CFR 262 Subpart C.

6. Is waste packaged in accordance with DOT regulations (required prior to movement of hazardous waste off site) Rule 305(1)(a)

I

Comments:

7. Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous materials (Required prior to movement of hazardous waste off-site) Rule 305(1)(b)(c)?

I

Comments:

8. On containers of 110 gallons or less does the appropriate information displayed include a warning and generators name, address, manifest document number and waste code as required in 40 CFR 172, 304, Rule 305(1)(d)

I

Comments: _____

Yes

No

N/A

Violation
Class

9. If required, are placards available to the transporter, Rule 305(1)(e)

I

Comments: _____

FRESHIPMENT ACCUMULATION
Drums/Roll-off Boxes/Gondolas

10. Is hazardous waste accumulated in containers?
If no, skip to (13)

N/A

- a.) Is each container clearly marked with accumulation date and hazardous waste number Rule 306(1)(c).
If no, how many _____

I

- b.) Has more than 90 days elapsed since date marked (Operating license needed as required in Part 5 of Rules)
If yes, how many drums _____
Accumulation dates _____

I

- c.) Is each container labeled or marked clearly with the words "Hazardous Waste" rule 306(c)
If no, how many _____

I

- d.) Are containers in good condition Rule 306(1)(a), 40 CFR 265.171.
If no, specifically what is their conditions. _____

I

- e.) Are containers compatible with waste in them. Rule 306(1)(a) 40 CFR 265.172. If no, explain _____

I

- f.) Are containers stored closed, Rule 306(1)(a), 40 CFR 265.173(a)
If no, how many _____

I

INSPECTION FORM B
Violation
Class

- | | Yes | No | N/A | Class |
|--|-------------------------------------|-------------------------------------|-------------------------------------|-------|
| g.) Are containers managed to prevent leaks. Rule 306(1)(a) 40 CFR 265.173(b). If no, explain _____ | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | I |
| h.) Are containers inspected weekly for leaks and defects. Rule 306(1)(a) 40 CFR 265.174. | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | I |
| i.) Are ignitable and reactive wastes stored at least 15 meters (50 feet) from property line? (Indicate if waste is ignitable or reactive) Rule 306(1)(a) 40 CFR 265.176. If no, explain _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | I |
| j.) Are incompatible wastes stored in separate containers. (If not the provisions of 40 CFR 265.17(b) apply) Rule 306(1)(a) 40 CFR 265.176. If no, explain _____ | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | I |
| k.) Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance? Rule 306(1)(a) 40 CFR 265.177. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | I |

Comments: _____

- | | | | | |
|--|--------------------------|-------------------------------------|-------------------------------------|-----|
| 11. Is hazardous waste being accumulated at the point of generation, Rule 306(2) If yes: | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | N/A |
| a.) Is container less than 55 gallons or 1 quart of acutely hazardous waste? Rule 306(2) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | I |
| b.) Is container under control of operator and near point of generation Rule 306(2) | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | I |
| c.) Are containers in good condition? Rule 306(2) 40 CFR 265.171. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | I |
| d.) Are containers compatible with waste in them? Rule 306(2) 40 CFR 265.172. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | I |
| e.) Are containers stored closed when not in use and managed to prevent leaks? Rule 306(2) 40 CFR 265.173. | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | I |

INSPECTION FORM B
Violation
Class

f.) Are containers marked with the words
"Hazardous Waste" and waste number (or
other words that identify the contents
Rule 306(2) Yes No N/A I

Comments: _____

12. If storing free liquids, does hazardous
waste storage area include:
Rule 306(1)(a) 40 CFR 264.175.

a.) Impervious base free of cracks
40 CFR 264.175(b)(1) ✓ — — I

b.) Containment capable of holding
10% of volume of containers or
10% of largest container whichever
is greater.
40 CFR 264.175(b)(2) — ✓ — I

Comments: _____

TANKS

13. Is hazardous waste accumulated in tanks?
If no, skip to 16. — ✓ — N/A

a.) Is each tank labeled or marked with
the words "Hazardous Waste",? Rule 306
(1)(a), 40 CFR 252.34(a) — — ✓ I

b.) Are tanks used to store only those
wastes which will not cause corrosion,
leakage or premature failure of the
tank Rule 306(1)(a), 40 CFR 262.192(b) — — ✓ I

c.) Do uncovered tanks have at least 60 cm
(2 feet) of freeboard, or dikes or
other containment structure Rule 306(1)
(a), 40 CFR 265.192(c). — — ✓ I

INSPECTION FORM B
Violation
Class

Yes No N/A

d.) Do continuous feed systems have a waste-feed cutoff Rule 306(1)(a), 40 CFR 265.192(d).

___ ___ ☒ ___ I

e. Are required daily and weekly inspections done? Rule 306(1)(a), 40 CFR 265.194?

___ ___ ☒ ___

f.) Are reactive and ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements. 261.21 or 261.23) rule 306(1)(a), 40 CFR 265.198?

___ ___ ☒ ___ I

g.) Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.) Rule 306(1)(a), 40 CFR 265.199.

___ ___ ☒ ___ I

h.) Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes? Rule 306(1)(a) 40 CFR 198(3)(b).

___ ___ ☒ ___ I

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet.

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

Comments: _____

INSPECTION FORM B
Violation
Class

Yes No N/A Class

14. Do above ground tanks have a 150% containment area constructed of impervious material? Rule 615(3)?

I

Comments:

15. Do owners and operators of underground tanks do all the following:

a.) Provide adequate secondary containment and leachate collection system? Rule 615(4)(a)

I

b.) Conduct an inventory of the contents of the tanks at least twice a month? Rule 615 (4)(b)

I

c.) Conduct leachate sampling at least once a year? Rule 615(4)(c)

I

d.) Maintain an accurate inventory of the tank? rule 615(4)(d)

I

Comments:

16. Is hazardous waste accumulated in other than tanks or containers? If yes, explain:

N/A

Comments:

INSPECTION FORM B

Yes	No	N/A	Violation Class
-----	----	-----	-----------------

PERSONNEL TRAINING
Rule 306(1)(d) 40 CFR 265.16

17. Do personnel training records contain the following:

a.) Job title 40 CFR 265.16(d)(1)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
b.) Job description 40 CFR 265.16(d)(2)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	I
c.) Description of training 40 CFR 265.16(d)(3)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	I
d.) Records of training 40 CFR 265.16(d)(4)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	II
e.) Do new personnel receive required training within 6 months. 40 CFR 265.16(b).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	I
f.) Do personnel training records indicate that personnel have taken part in an annual review of initial training. 40 CFR.16 (b)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	I

Comments: _____

PREPARDNESS AND PREVENTION
RULE 306 (1)(d) 40 CFR 265. Subpart C

18. Is there any evidence of fire, explosion, or release of hazadous waste or hazardous waste constituent 40 CFR Rule 265.31. ☒ ☐ ☐ I

Comments: _____

19. If required, does this facility have the following equipment: 40 CFR 265.32

INSPECTION FORM B
Violation Class

	Yes	No	N/A	Violation Class
a.) Internal communications or alarm systems. 40 CFR 265.32(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
b.) Telephone or 2-way radios at the scene of operations. 40 CFR 265.32(a)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
c.) Portable fire extinguishers, fire control, spill control equipment and decontamination equipment. 40 CFR 265.32(c)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
d.) Indicate the volume of water and/or foam available for fire control.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	N/A

Comments: _____

20. Testing and Maintenance of Emergency Equipment.

a.) Has the owner or operator established testing and maintenance procedures for emergency equipment. 40 CFR 265.33	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
b.) Is emergency equipment maintained in operable condition? 40 CFR 265.33.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I
c.) Has owner/operator provided immediate access to internal alarms? (if needed) 40 CFR 265.34(a)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	I
d.) Is there adequate aisle space for unobstructed movement for personnel and emergency equipment? 40 CFR 265.35	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	I

Comments: _____

INSPECTION FORM B
Violation
Class

Yes No N/A

CONTINGENCY PLAN AND EMERGENCY PROCEDURES
Rule 306(1)(d) 40 CFR 265 Subpart D

21. Does the contingency plan contain the following information:

- | | | | | |
|---|-------|---|-------|----|
| a.) The actions facility personnel must take to comply with 265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable). 265.52 | _____ | ✓ | _____ | I |
| b.) Describe arrangements or attempts to make arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to 40 CFR 265.52(c) 40 CFR 265.37. | _____ | ✓ | _____ | II |
| c.) Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator. 40 CFR 265.52(d) | _____ | ✓ | _____ | II |
| d.) A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities. 40CFR265.52(e) | _____ | ✓ | _____ | II |
| e.) An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?) 40 CFR 265.52(f). | _____ | ✓ | _____ | II |

INSPECTION FORM B

	Yes	No	N/A	Violation Class
f.) Is the facility emergency coordinator identified? 40 CFR 265.55	—	✓	—	II
g.) Is coordinator familiar with all aspects of site operation and emergency procedures? 40 CFR 265.55	—	✓	—	II
h.) Does the Emergency Coordinator have the authority to carry out the Contingency Plan? 40CFR265.55	—	✓	—	II
i.) If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?	—	—	✓	I
j.) Has the contingency plan been amended to reflect changes in regulations, plan factor changes in the facility, list of emergency coordinators, changes in emergency equipment. 265.54	—	✓	—	II

Comments: _____

22. Are copies of the Contingency Plan available at site and local emergency organizations. 40 CFR 265.53

— ✓ — II

Comments: _____

INTERNATIONAL SHIPMENTS

Rule 309, 40 CFR 262.50

23. Has the installation imported or exported hazardous waste? If no, skip a and b.

— ✓ — N/A

INSPECTION FORM
Violation
Class

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	
a.) Exporting Hazardous Waste, has a generator:				
i.) Notified the Administrator in writing?	_____	_____	✓	I
ii.) Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	_____	_____	✓	I
iii.) Met the Manifest requirements?	_____	_____	✓	I
b.) Importing Hazardous Waste, has the generator met the manifest requirements?	_____	_____	✓	I

Comments: _____

IN DATE

Statement Date: JUN 30 1985

DUNS: 06-222-7897
 DYMET CORPORATION
 (SUBSIDIARY OF RETURN ON
 INVESTMENTS CORPORATION,
 MUSKEGON, MI)

1901 PECK ST
 MUSKEGON MI 49441
 TEL: 616 726-5061

DATE PRINTED
 JUL 22 1987

MFG MISCELLANEOUS
 FABRICATED METAL
 PRODUCTS
 SIC NO.
 34 99

SUMMARY
 RATING --
 STARTED 1973
 PAYMENTS SEE BELOW
 WORTH F \$(259,240)
 EMPLOYS 55
 HISTORY CLEAR
 FINANCING SECURED
 CONDITION UNBALANCED
 TREND DOWN

Larry Lathrop 1901 Peck St Muskegon
 CHIEF EXECUTIVE: CARL W HILTON, CEO

PAYMENTS (Amounts may be rounded to nearest figure in prescribed ranges)

REPORTED	PAYING RECORD	HIGH CREDIT	NOW OWES	PAST DUE	SELLING TERMS	LAST SALE WITHIN
07/87	Slow 45	500	-0-	-0-		6-12 Mos
	Slow 60-90	50	-0-	-0-		
Q 37	(003)	1000	1000	1000		6-12 Mos
05/87	Ppt	50	-0-	-0-	N30	2-3 Mos
	Ppt-Slow 60	500	-0-	-0-	1 10 N30	6-12 Mos
	Ppt-Slow 90	30000	30000	-0-		1 Mo
	Slow 25	5000	2500	2500	N30	
	Slow 60	2500	2500	-0-	N30	1 Mo
	Slow 60	50	50	50	1 10 N30	
	Slow 90	100	100	100		
04/87	Ppt	100	-0-	-0-	N30	2-3 Mos
	Slow 30-90	50	50	50	N30	
	(013)			500		
	Placed for collection.					
	(014)			500		
	Placed for collection.					
	(015)	2500			Sales COD	6-12 Mos
	(016)	250	250			
03/87	Ppt		-0-	-0-	N15	6-12 Mos
	Ppt-Slow 60	1000	100	50	N15	1 Mo
	(019)	50	-0-	-0-	N15	1 Mo
02/87	Slow 90	70000	60000	60000		2-3 Mos
	Slow 90	100	-0-	-0-	1 10 N30	
	(022)			100		
	Placed for collection.					
01/87	Ppt	50				
	(024)	50	-0-	-0-	1 10 N30	
10/86	Slow 120	50	-0-	-0-	N10	
	(026)	50	50	-0-		
09/86	(027)			500		
	Placed for collection.					
	(028)			250		
	Placed for collection.					

07/86 Slow 30 50 50 50

* Payment experiences reflect how bills are met in relation to the terms granted. In some instances payment beyond terms can be the result of disputes over merchandise, skipped invoices etc.

* Each experience shown represents a separate account reported by a supplier. Updated trade experiences replace those previously reported.

* Accounts are sometimes placed for collection even though the existence or amount of the debt is disputed.

FINANCE

* A FINANCIAL SPREAD SHEET OF COMPARATIVES, RATIOS, AND INDUSTRY AVERAGES

* MAY BE AVAILABLE. ORDER A DUNS FINANCIAL PROFILE VIA YOUR DUNSPRINT

* TERMINAL OR BY CALLING DUNS DIAL AT 1-800-DNB-DIAL.

08/19/86

	Fiscal Jun 30 1982	Fiscal Jun 30 1983	Fiscal Jun 30 1985
Curr Assets	449,021	409,908	661,437
Curr Liabs	1,182,471	821,660	589,245
Current Ratio	.38	.50	1.12
Working Capital	(733,450)	(411,752)	72,192
Other Assets	741,287	710,277	608,291
Long Term Debt	102,576	220,451	939,723
Worth	(94,439)	78,074	(259,240)

Fiscal statement dated JUN 30 1985:

Cash	\$ (26,552)	Accts Pay	\$ 339,152
Accts Rec	371,246	Accruals	56,582
Inventory	287,897	Taxes	169,146
Ppd Expenses	28,846	Other Curr Liabs	24,365

Curr Assets	661,437	Curr Liabs	589,245
Fixed Assets	608,291	L T Debt	939,723
		COMMON STOCK	5,416
		ADDIT. PD.-IN CAP	1,053,635
		RETAINED EARNINGS	(1,315,091)
		TREASURY STOCK	(3,200)

Total Assets 1,269,728 Total 1,269,728

Statement obtained from Michigan Departemnt of Commerce. Extent of audit, if any, not indicated.

--O--

Fixed assets shown net less \$1,493,223 depreciation.

No contingent debt indicated. Long term debt consists of obligations owing to a commercial lending institution, which are secured by essentially all assets.

On AUG 19 1986 John Holman, president, referred to the above figures.

He stated that sales for the fiscal year ended Jun 30 1986 were even compared to the same period last year. Operations for the period were conducted at a loss.

Slowness was attributed to a lack of working capital. Further comment in regards to statement item updates and explanations were declined. The bank used was also not revealed.

Condition is unbalanced with debt at a significant deficit position.

PUBLIC FILINGS

06/30/87 On Apr 28 1987, a federal tax lien (#FL91419) in the amount of \$34,592 was recorded against Dymet Corporation and filed by Internal Revenue Service.

06/16/87 On 3/20/87, a state tax lien (#SL94202) in the amount of \$2,522 was recorded against Dymet Corporation and filed by state of MI.

02/20/87 On Dec 4 1986, a state tax lien (#SL91090) in the amount of \$2,098 was recorded against Dymet Corporation and filed by State of MI.

10/14/86 On 08/04/86, a state tax lien (#SL86787) in the amount of \$5,761 was recorded against Dymet Corporation and filed by State of MI

UCC FILINGS

08/19/86 Financing Statement #B597141 filed 10-16-84 with Secretary, State of MI. Debtor: Dymet Corporation, Muskegon, MI. Secured Party: Trefoil Capital Corp, Chicago, IL. Collateral: leased machinery, equipment, fixtures and products.

08/19/86 Financing Statement #B452234 filed 07-14-83 with Secretary, State of MI. Debtor: Dymet Corporation, Muskegon, MI. Secured Party: The Economic Dev Corp, Muskegon, MI. Collateral: all machinery, equipment fixtures including proceeds and products.

The public record items reported above under "PUBLIC FILINGS" and "UCC FILINGS" may have been paid, terminated, vacated or released prior to the date this report was printed.

HISTORY
06/19/86

CARL W HILTON, CEO

JOHN HOLMAN, PRES

DIRECTOR(S): THE OFFICER(S)

Incorporated Michigan Feb 13 1973. Authorized capital consists of 1,000 shares common stock, no par value.

Business started Jul 1 1973 by officers of the parent. 100% of capital stock is owned by parent.

CARL W HILTON born 1926 married. Solvent Process Division of Allied Chemical Corp, Detroit, MI, 1946-52. Amplex Division of Chrysler Corp, Detroit, MI, 1952-55. Started the parent company in 1955 and continues as Pres.

JOHN HOLMAN born 1945 married. 1970 graduate of the University of Wisconsin, Madison, WI. 1970-78 IBM Corp, Columbus, OH. 1978-81 Pure Carbon Company, Coudersport, PA. 1981-84 Advance Products Corp, Beaver Dam, WI. 1984 started here.

Subsidiary of parent:

GENERAL RESOURCE CORP, Muskegon, MI, acquired 1981. Operates a bowling alley, bar and pro shop. Intercompany relations: none.

OPERATION

08/19/86 Subsidiary of Return On Investments Corporation, Muskegon, MI started 1955 which operates as a holding company. Parent company owns 100% of capital stock. Intercompany relations: management services from the parent to the subsidiary.

Parent company has 1 other subsidiary.

As noted subject is a subsidiary of Return On Investments Corporation, DUNS number 00-523-3093 and reference is made to that report for background information on its officers and operations.

Manufactures miscellaneous fabricated metal products from powdered metal.

Sales on 30 day terms. Has 200 accounts. Sells to manufacturers.
Territory :United States.
Nonseasonal.

EMPLOYEES: 55 including officers.

FACILITIES: Owns 28,000 sq. ft. in one story brick building in
normal condition. Premises old but well kept.

LOCATION: Suburban business section on well traveled street.

07-22(9A0 /43) 33101 005233093 042 162
Analytical

FULL DISPLAY COMPLETE

IN DATE

DUNS: 00-523-3093
RETURN ON INVESTMENTS
CORPORATION
R.O.I. CORP
WATERSHED CO

1901 PECK ST
AND BRANCH(ES) OR DIVISION(S)
MUSKEGON MI 49441
TEL: 616 726-5061

DATE PRINTED
JUL 22 1987

SUMMARY
RATING: --
MFG & WHOL BEARINGS STARTED 1955
PAYMENTS SEE BELOW
EMPLOYS 65(1 HERE)
HISTORY CLEAR

SIC NOS.
35 62 50 85

CHIEF EXECUTIVE: CARL HILTON, PRES

PAYMENTS (Amounts may be rounded to nearest figure in prescribed ranges)
REPORTED PAYING HIGH NOW PAST SELLING LAST SALE
RECORD CREDIT OWES DUE TERMS WITHIN

04/87 Slow 20 250 Sales COD
(002)
08/86 Ppt 50 -0- -0- N15 6-12 Mos

* Payment experiences reflect how bills are met in relation to the terms granted. In some instances payment beyond terms can be the result of disputes over merchandise, skipped invoices etc.

* Each experience shown represents a separate account reported by a supplier. Updated trade experiences replace those previously reported.

FINANCE
05/21/87

Fiscal
Jun 30 1985

Curr Assets 1,041,159
Curr Liabs 404,193
Other Assets 1,984,164
Worth 1,101,299

On MAY 21 1987 Mey Zuinmerman, secretary, declined all information.

On May 21 1987, Carl Hilton declined all information through secretary.

PUBLIC FILINGS
UCC FILINGS

05/21/87 Financing Statement #58910A filed 07-13-83 with Secretary, State of MI. Debtor: Return on Investments Corporation, Muskegon, MI. Secured Party: Trefoil Capital Corp, Chicago, IL. Collateral: specified limited partnership interest and proceeds.

05/21/87 Financing Statement #1768128 filed 07-12-83 with Secretary, State of IL. Debtor: Return on Investments Corporation, Muskegon, MI. Secured Party: Trefoil Capital Corp, Chicago, IL. Collateral: specified rights, title and interest and proceeds.

05/21/87 Financing Statement #1768129 filed 07-12-83 with Secretary, State of IL. Debtor: Return on Investments Corporation, Muskegon, MI.

Secured Party: Trefoil Capital Corp, Chicago, IL. Collateral: specified promissory note of Apr 6 1981 and proceeds.

05/21/87 Financing Statement #B429523 filed 05-02-83 with Secretary, State of MI. Debtor: Return on Investments Corporation, Muskegon, MI. Secured Party: Exchange National Bank, Chicago, IL. Collateral: specified certain promissory note dated Dec 17 1981.

The public record items reported above under "PUBLIC FILINGS" and "UCC FILINGS" may have been paid, terminated, vacated or released prior to the date this report was printed.

HISTORY

05/21/87

CARL HILTON, PRES
DIRECTOR(S): THE OFFICER(S)

Incorporated Michigan May 15 1978. Authorized capital consists of 500 shares common stock, \$100 par value.

Business started 1955 by Carl Hilton. Relocated 1979 from Chicago, IL. 100% of capital stock is owned by Carl Hilton.

Outside investigation reveals the following: Incorporated Illinois Jun 25 1955 as Master Corporation. Effective Nov 13 1972 the name of the corporation was changed by special charter amendment to Return On Investments Corporation.

CARL HILTON born 1926 married. Employed by Solvey Process Division of Allied Chemical Die Corporation, Detroit, Michigan 1946 to 1952. Employed by Amplex Division of Chrysler Corporation, Detroit, Michigan 1952 to 1955. In 1955 he was one of the organizers of the subject corporation. He is also reported as Pres of TOOLMAKERS INC, locally. That is a Michigan corporation chartered Mar 9 1979. Engaged in powdered metal tooling.

OPERATION

05/21/87

Holding company owning stock in two subsidiaries. The subsidiaries manufacture bearings 50% and operates bowling alley, bar and pro shop 50%.

Terms are net 30 days. Has 200 accounts. Sells to industrial accounts. Territory :United States.

Nonseasonal.

EMPLOYEES: 65 including officers. 1 employed here.

FACILITIES: Rents 900 sq. ft. in 1 story brick building in good condition. Premises neat.

LOCATION: Suburban business section on well traveled street.

SUBSIDIARIES: DYMET CORPORATION, Muskegon, MI, a Michigan corporation chartered Feb 13 1973, authorized capital 1,000 shares, no par value common stock. Manufactures bearings.

GENERAL RESOURCE CORP, Muskegon, MI, acquired 1981. A Michigan corporation chartered Sep 5 1980, authorized capital 50,000 shares \$1 par value. Operates bowling alley, bar and pro shop.

07-22(251 /30)

00000

042

H

DYMET
CORPORATION

1901 PECK STREET
P.O. BOX 1016
MUSKEGON, MICHIGAN
49443
616-726-5061



DYMET
RECEIVED

JUL 28 1983

HAZARDOUS WASTE DIVISION

July 27, 1983

Ms. Elizabeth A. Bols
Department Of Natural Resources
350 Ottawa N. W.
Grand Rapids, Michigan. 49503

MD 062 227 897

Dear Ms. Bols

Included is a copy of the letter that was sent to the Environmental Protection Agency, to change Dymet to a small quantity generator. All containers have hazardous waste labels with the starting date put on them. We have copies of our waste manifest from the designated facility on file. Any question's please call.

Thank You

Jesse Austin
Jesse Austin



DYMET

DYMET

CORPORATION

1901 PECK STREET
P.O. BOX 1016
MUSKEGON, MICHIGAN
49443
616-726-5061

July 27, 1983

United States Environmental Protection Agency
Resource Conservation And Recovery Act Activities
P.O. Box A3587
Chicago, Illinois 60690

Dear Sirs,
Dymet Corporation [EPA ID NO. MID 062 227 897] would like
to change our status from Generator to Small Quantity Generator
- 40 CFR, section 261.5. We generate less than the 1000
kilograms in a calendar month. Any questions please contact
me.

Sincerely,

Jesse K. Austin
Jesse K. Austin
Building Manager

Code: 5
Status: X

8/12/83

elw

EPA

STATE OF MICHIGAN



James Blanchard
XXXXXXXXXXXXXXXXXXXX Governor

DEPARTMENT OF NATURAL RESOURCES

HOWARD A. TANNER, Director

NATURAL RESOURCES COMMISSION

JACOB A. HOEFER
CARL T. JOHNSON
M. LAITALA
HILARY F. SNELL
HARRY H. WHITELEY
JOAN L. WOLFE
CHARLES G. YOUNGLOVE

STEVENS T. MASON BUILDING
BOX 30028
LANSING, MI 48909

State Office Building
350 Ottawa N. W.
Grand Rapids, Michigan 49503
Phone: 456-5071

July 15, 1983

Mr. Jesse Austin
Dymet Corporation
1901 Peck Street
Muskegon, Michigan 49441

RE: MID 062 227 897

Dear Mr. Austin:

On July 13, 1983, staff of the Department of Natural Resources conducted an investigation of your facility located at 1901 Peck Street, Muskegon, Michigan to evaluate compliance of that facility with requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA), as amended. The completed RCRA inspection form is enclosed.

As a result of the investigation, staff of the Department of Natural Resources determined that the above facility is in violation of the requirements of Subtitle C of RCRA. Specifically, staff found that:

A generator who does not receive a copy of the signed manifest from the designated facility within 35 days of date the waste was initially transported must contact the transportor and/or the designated facility to determine status of the hazardous waste. If the generator has not received the signed copy of the manifest from the designated facility within 45 days of the date the waste was initially transported, an Exception Report must be submitted to the EPA Regional Administrator 40 CFR, Subpart D, 262.42 (a) and (b).

Each container must be clearly marked with the date on which the period of accumulation begins and the words "Hazardous Waste" while the waste is being stored on site. 40 CFR, Subpart C, Section 262.34 (2) and (3).

The facility must have a current Contingency Plan and Emergency Procedures, Section 265.50 through 265.56, as mandated in 40 CFR, Subpart C, 262.34(a) (4).



Mr. Jesse Austin
July 15, 1983
Page 2

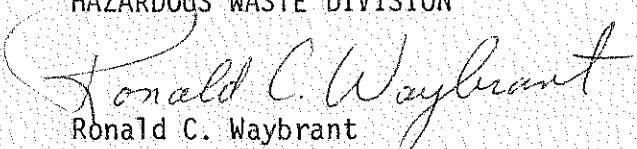
Personnel training records were not available for review; Section 265.16, mandated in 40 CFR, Subpart C, Section 262.34(a) (4).

We request that you respond to this letter by July 29, 1983, providing documentation to this office regarding those actions being taken to correct the above stated violations and correction of same violations prior to August 15, 1983.

If you have any questions, feel free to contact Elizabeth Bols at (616) 456-5071. Please address your response to the above address on this letter.

Sincerely,

HAZARDOUS WASTE DIVISION



Ronald C. Waybrant
District Supervisor

RCW/kij

Enclosure

RCRA Inspection Report

EPA Identification Number: M I D 0 6 2 2 2 7 8 9 7

Installation Name: Dymet Corporation

Location Address: 1901 Peck Street

City: Muskegon State: MI

Date of inspection: 7-13-83 Time of inspection (from) 1430 (to) _____

Person(s) interviewed	Title	Telephone
<u>Jesse Austin</u>	<u>Bldg Maint.</u>	<u>(616) 726-5061</u>

Inspector(s)	Agency/Title	Telephone
<u>Elizabeth A. Bols</u>	<u>MDNR / Env. San.</u>	<u>(616) 456-5071</u>

Installation Activity (mark only one box)

Inspection Form(s)

- | | |
|--|------|
| <input type="checkbox"/> Treatment/Storage/Disposal per 40 CFR 265.1 and/or Generation and/or Transportation | A |
| <input type="checkbox"/> Treatment/Storage/Disposal (no generation or Transportation) | A |
| <input type="checkbox"/> Generation and Transportation | B, C |
| <input checked="" type="checkbox"/> Generation only | B |
| <input type="checkbox"/> Transportation only | C |

manufacture sintered metals

FOO1 1,1-1 trichloroethane (11 lbs / gallon) approx 2-55 gallon drums / month

FOO6 Cadmium plating w/ cyanide approx. 2-55 gallon drums / yr.
if they need cleaning

INSPECTION FORM B

Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	Yes	No	NI*	Remarks
(1) Does the generator have copies of the manifest available for review? 262.40	<input checked="" type="checkbox"/>			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>2</u>				
(3) Do the manifest forms examined contain the following information? (If possible, make 262.21 copies of, or record information from, manifests that do not contain the critical elements)	<input checked="" type="checkbox"/>			
a. Manifest document number?	<input checked="" type="checkbox"/>			0297521
b. Name, mailing address, telephone number, and EPA ID number of generator?	<input checked="" type="checkbox"/>			MI DO 62227897
c. Name and EPA ID number of transporter(s)?	<input checked="" type="checkbox"/>			IND 980590947
d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>			Chem. Co. 674-5931 (219) IND 980590947
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>			604 S. Scott South Bend Ind. 1-1-1 trichloroethene DEMA
f. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>			
g. Required certification?	<input checked="" type="checkbox"/>			
h. Required signatures?	<input checked="" type="checkbox"/>			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. <u>0</u> (in 1983) others in 1981				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>0</u>				

ction C - PRE-TRANSPORT REQUIREMENTS
(40 CFR Part 262 Subpart C)

	Yes	No	NI	Remarks
(1) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<u>X</u>			
(2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site) 262.31 and 262.32			<u>X</u>	
(3) If required, are placards available to transporter? 262.33			<u>X</u>	<u>Transporter provides</u>
** (4) Pre-shipment Accumulation:				<u>Chem - solve - South</u>
** applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.				<u>Bend Ind</u>
a. Is hazardous waste accumulated in containers? If no, skip to b. 262.34	<u>X</u>			<u>FOOI & FOOB</u>
i. Is each container clearly marked with the date on which the period of accumulation began?		<u>X</u>		<u>55 gallon drums</u>
ii. Have more than 90 days elapsed since the dates marked?	<u>X</u>	<u>X</u>		<u>4-20-83</u>
iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?"		<u>X</u>		<u>"Yellow labels" put on drum</u>
iv. Are containers in good condition?	<u>X</u>			<u>prior to shipping</u>
v. Are containers compatible with waste in them?	<u>X</u>			
vi. Are containers managed to prevent leaks?	<u>X</u>			
vii. Are containers stored closed?	<u>X</u>			
viii. Are containers inspected weekly for leaks and defects?	<u>X</u>			
ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).			<u>X</u>	

- ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

- c. Is hazardous waste accumulated in other than tanks or containers?

_____ X _____

- d. Personnel training. 262.34 (a) 5

Do personnel training records include: 265.16

- i. Job Titles?
ii. Job Descriptions?
iii. Description of training?
iv. Records of training?
v. Did personnel receive the required training by 5-19-81?
vi. Do new personnel receive required training within six months?
vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training?

_____ X _____
_____ X _____
_____ X _____
_____ X _____
_____ X _____
_____ X _____
_____ X _____

- e. Preparedness and Prevention 265. Subpart C

- i. Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31

_____ X _____

- ii. If required, does this facility have the following equipment: 265.32

Internal communications or alarm systems?

☒ ☐ ☐ PA.

Telephone or 2-way Radios at the scene of operations?

☒ ☐ ☐

Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

☒ ☐ ☐ sprinkler
culbing around F006

Indicate the volume of water and/or foam available for fire control:

City water

- iii. Testing and Maintenance of Emergency Equipment: 265.33

Has the owner or operator established testing and maintenance procedures for emergency equipment?

☒ ☐ ☐

Is emergency equipment maintained in operable condition?

☒ ☐ ☐

- iv. Has owner/operator provided immediate access to internal alarms (if needed)?

☐ ☐ ☒

- v. Is there adequate aisle space for unobstructed movement?

☒ ☐ ☐

- vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?

☒ ☐ ☐ fire dept.

- f. Contingency Plan and Emergency Procedures 265 Subpart D

Does the contingency plan contain the following information:

- i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52

☐ ☒ ☐

	Yes	No	NI	Remarks
ii. Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?	—	X	—	—
iii. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	—	X	—	—
iv. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	—	X	—	—
v. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)	—	X	—	—
vi. Are copies of the Contingency Plan available at site and local emergency organizations?	—	X	—	—
vii. Is the facility emergency coordinator identified?	—	X	—	—
viii. Is coordinator familiar with all aspects of site operation and emergency procedures?	—	X	—	—
ix. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	—	X	—	—
x. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?	—	X	—	—

Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

Yes No NI Remarks

- (1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40

— — X listed

Section E: INTERNATIONAL SHIPMENTS (Part 262 Subpart E)
262.50

- (1) Has the installation imported or exported hazardous waste? If "no", skip a and b.

— X — —

a. Exporting Hazardous Waste, has a generator:

i. Notified the Administrator in writing?

— — X —

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

— — X —

iii. Met the Manifest requirements?

— — X —

b. Importing Hazardous Waste, has the generator met the manifest requirements?

— — X —

ACT 64 INSPECTION REPORT

U.S. EPA I.D. NUMBER MD 1 D 06 2 2 2 7 8 9 7
(or Michigan)

FACILITY NAME Dymet Corporation

1901 Peck Street

Muskegon CITY MICHIGAN 49441 ZIP CODE

DATE 12-15-86 TIME OF INSPECTION (FROM) _____ (TO) _____

PERSON(S) INTERVIEWED	TITLE	TELEPHONE
<u>Jesse Austin</u>	_____	_____
_____	_____	_____

INSPECTOR(S)	AGENCY/TITLE	TELEPHONE
<u>Elizabeth A. Bols</u>	<u>MDNR</u>	<u>(616) 456-5071</u>
_____	_____	_____

Primary Business of this Facility: _____

Reason for Inspection:

X Routine _____ Follow-up _____ Complaint

INSPECTION FORMS:

Based upon the inspection, this facility:

- | | |
|--|--------------------------|
| _____ is a non-generator/conditionally exempt small quantity generator | FORM
A
B
C
D |
| _____ small quantity generator | |
| <u>X</u> generator | |
| _____ transporter | |
| _____ treatment/storage/disposal facility | |

Date of Last Inspection 7-13-83

Dymet Corporation
12-15-86

INSPECTION FORM B
Part 3 Rules
P.A. 64 of 1979

GENERATOR INSPECTION FORM

(Generates 1000 kg per month or accumulates 1000 kg at any time)

- ☒ Drums (Containers)
☐ Above ground tank(s)
☐ Underground tank(s)
☐ Other _____

HAZARDOUS WASTE CODE/NAME	WASTE STREAM(S)		HOW MUCH
	SOURCE	TYPE OF STORAGE	
D006	Cd plate bottoms	drums	

COMMENTS:

generation is @ the rate of 2.4 55 gallon drums/year
but facility has accumulated 5-55 gallon & 11-35 gallon
drums of waste on-site